Standard Operating Procedures
For
Disposal of Controlled Substances

Purpose

The purpose of this document is to establish specific standard operating procedures for disposal of DEA Schedule I, II, III, IV and V controlled substances. This procedure provides research and clinical personnel assistance with disposing of unwanted or expired controlled substances in a safe and controlled manner.

Applicability

This standard operating procedure applies to all research and clinical operations of Drexel University and Drexel University College of Medicine.

Procedure

Disposal for Registrants

1. Access the online chemical pickup request system at:

   http://www.drexel.edu/facilities/healthSafety/serviceRequests/ChemicalPickupRequest/

2. Complete and submit the online chemical pickup request form indicating the contact information, controlled substance name with DEA schedule number, state, hazard classification (controlled substance), container type, number of containers and total weight/volume of material.

3. The request system will send an automated email to the requestor upon submission. The request system records the date and time of submission.

4. Upon receiving this request the Department of Environmental Health and Safety will electronically send the requestor within 72 hours the Request for Incineration Form from Chesapeake Waste Solutions.

5. The requestor must complete the forms including registrant name, DEA number, and expiration date, name of material, NDC #, and strength of material. The requestor shall sign and date the form and send it to the Hazardous Materials Manager via email, along with a copy of their current DEA registration.

6. The Department of Environmental Health and Safety will send the completed forms and copy of the researcher’s current registration to Chesapeake Waste Solutions for DEA approval.

7. Upon approval, Chesapeake Waste Solutions will send shipping directions, documents and a shipping label directly to the requestor.
8. The requestor will package the shipment per Chesapeake’s directions and send the package to Chesapeake Waste Solutions within 72 hours from receiving the packaging and shipping directions. Failure to ship this material within the time frame will cancel the incineration request.

9. **The Department of Environmental Health and Safety is not permitted to take possession, handle or destroy control substance.**

**Disposal for Non-Registrants or Expired Registrants**

1. All non-registered personnel in possession of a controlled substance may request assistance by submitting a letter to the Special Agent in Charge of the Administration in the area in which the person is located for authority and instructions to dispose such substances.

2. The Special Agent in Charge can be determined by contacting the local area DEA office. The locations can be found at [http://www.deadiversion.usdoj.gov/offices_n_dirs/index.html](http://www.deadiversion.usdoj.gov/offices_n_dirs/index.html).

3. The letter must state the following:
   a. Name and address of the requestor.
   b. Name and quantity of each controlled substance to be disposed.
   c. How the requestor obtained the substance, if known; and
   d. Name, address, and registration number, if known, of the person who possessed the controlled substance prior to the requestor, if known.

4. The Special Agent in Charge will authorize and instruct the requestor to dispose the controlled substance in one of the following manners:
   a. Transfer to person registered under the Act and authorized to possess the substance.
   b. Deliver to an agent of the Administration or to the nearest office of the Administration.
   c. Destroy the substance in the presence of an agent of the Administration or other authorized person; or
   d. By such other means as the Special Agent in Charge may determine to assure that the substance does not become available to unauthorized persons.

5. Please remember the Special Agent in Charge can only authorize disposal. The Department of Environmental Health and Safety is not permitted to take possession, handle or destroy controlled substances.

**Recordkeeping**

1. The Department of Environmental Health and Safety will scan and maintain all transfer paperwork for disposals associated with current DEA Registrants.
   a. A copy of the destruction manifest from Chesapeake Waste Solutions will be stored on the department’s shared drive. An electronic copy of the destruction manifest will be sent to the requestor for recordkeeping.
   b. The Department of Environmental Health and Safety will maintain all records for period of five years.

2. All non-registered requestors should keep all records of the correspondence to the Special Agent in Charge and any disposal documents.
Forms:

REQUEST FOR INCINERATION
DEA SCHEDULE II CONTROLLED SUBSTANCES

This form is to be used for requesting incineration of DEA C-II controlled substances by Chesapeake Waste Solutions, Inc. (CWS). Upon receipt of this form and approval of all of the substances for incineration, CWS will prepare a DEA Form 222, send the Form 222 to the shipper along with a shipping label and directions for shipping. CWS will not accept any shipments of C-II controlled substances unless accompanied by a CWS prepared Form 222 and the appropriate CWS shipping documents. Questions should be directed to Mr. Dan Luchansky at 610-770-9135

SHIPPER INFORMATION: (Enter all shipper information as indicated on your current DEA Registration)

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<th>Authorized Registrant Name</th>
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Expiration Date

Address

City

State Zip Code

Authorized Registrant Signature Date

Phone

C-II MATERIALS INFORMATION:
(Only ten entries per form. Complete information must be entered or form will be returned for proper completion. Each partial package must be entered on a separate line. Multiple full packages of the same product may be entered on the same line)

<table>
<thead>
<tr>
<th>NAME OF ITEM</th>
<th>NATIONAL DRUG CODE (NDC #)</th>
<th>NUMBER OF PACKAGES</th>
<th>CONTENTS (Number of grams, tablets, ounces or other units per package)</th>
<th>STRENGTH Controlled substance content (Each Unit)</th>
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Mail or FAX (610)770-9136 a correctly completed copy of this form AND a photocopy of your current DEA Registration to: CWS Pharmaceutical Services Center, P.O. Box 10968, Lancaster, PA 17605-0968
REQUEST FOR INCINERATION-CWS Form 3, 4, 5, List I Chemicals Schedule III, IV, V Controlled Substances

This form is to be used for requesting incineration of DEA C-II controlled substances by Chesapeake Waste Solutions, Inc. (CWS). Upon receipt of this form and approval of all of the substances for incineration, CWS will send a shipping label and directions for shipping. CWS will not accept any shipments of controlled substances unless accompanied by appropriate CWS shipping documents. Questions should be directed to Mr. Dan Luchansky at 610-770-9135

SHIPPER INFORMATION: (Enter all shipper information as indicated on your current DEA Registration)

Authorized Registrant Name ________________________________ DEA No. __________________
Expiration Date ________________________________
Address ____________________________________________ City ________________________________
State _______ Zip Code _______
Authorized Registrant Signature ____________________________ Date __________________
Phone ______________________________

MATERIALS INFORMATION:
(Only ten entries per form. Complete information must be entered or form will be returned for proper completion. Each partial package must be entered on a separate line. Multiple full packages of the same product may be entered on the same line)

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