



**NEW YORK STATE DEPARTMENT OF HEALTH
BUREAU OF NARCOTIC ENFORCEMENT**

***Application to Conduct a Pharmaceutical Collection Event
(Controlled Substances)***

Instructions and Application (DOH-4446)

[Instructions and Application are available on the DOH website as separate downloads]
www.health.ny.gov/professionals/narcotic/

New York State Department of Health
Bureau of Narcotic Enforcement
Riverview Center
150 Broadway
Albany, New York 12204
1-866-811-7957 (Option #4)

The New York State Department of Health's Bureau of Narcotic Enforcement is responsible for approving the manner and detail of disposal/destruction of controlled substances by those entities registered by the federal Drug Enforcement Administration, as well as those licensed by the Department. Similarly, disposal of household pharmaceuticals is guided by the New York State Department of Environmental Conservation. The Departments of Health and Environmental Conservation have developed a collaborative approval process for community-sponsored pharmaceutical collection events as one method of ensuring proper pharmaceutical disposal that both protects the environment and minimizes the potential for diversion. While pharmaceutical collection events have, to date, been limited to the disposal of household pharmaceuticals, the disposal of pharmaceutical waste generated by facilities/programs licensed by the Department of Health as Class 3A Institutional Dispensers Limited may now also be managed at such events, subject to very specific conditions and approvals, as outlined below.

Pharmaceutical collection events require approval by the Department of Health's Bureau of Narcotic Enforcement and the Department of Environmental Conservation, as well as a separate approval by the Drug Enforcement Administration.

Contact information for each agency can be found on Page 2 of these instructions.

The pharmaceutical collection event application process imposes reasonable requirements and procedural safeguards to ensure that controlled substances surrendered are not subject to diversion. **Specifically, law enforcement must be on-site at all times during each event and take immediate possession of all controlled substances surrendered for subsequent disposal.**

Since the inception of the pharmaceutical collection event program, it has been the preference of the Bureau of Narcotic Enforcement that licensed pharmacists be involved in the events to identify and inventory controlled substances. The Bureau's goal has been to ensure that any controlled substances surrendered to law enforcement for subsequent disposal are accurately identified and accounted for. However, in cases where law enforcement takes possession of all pharmaceuticals (both controlled and non-controlled) surrendered at an event, the identification and inventorying of controlled substances becomes essential only for purposes of evaluation. Accordingly, the involvement of a pharmacist is not required (but most certainly welcomed). If law enforcement takes possession of controlled substances only, the participation of a licensed pharmacist is required to ensure that the controlled substances are accurately identified and not integrated with any non-controlled substances collected.

To obtain approval to conduct a pharmaceutical collection event, an *Application to Conduct a Pharmaceutical Collection Event (Controlled Substances)* must be submitted to the Bureau of Narcotic Enforcement **at least 30 days in advance of the event**, along with a variety of supporting documentation, including:

- ✓ An event plan which outlines the logistics of the event, including site and collection information and security arrangements.
- ✓ A letter from the Department of Environmental Conservation granting a variance allowing for the disposal of pharmaceuticals surrendered in a solid waste incinerator, as applicable (please review www.dec.ny.gov/chemical/45083.html for more information).
- ✓ A letter from the law enforcement agency to be present at the event, which includes a statement that the agency agrees to take possession of all controlled substances surrendered during the event, as well as a plan for their ultimate disposal.

****SEE PAGE 2 FOR PHARMACEUTICAL COLLECTION EVENTS SPONSORED BY CLASS 3A FACILITIES/PROGRAMS****

Pharmaceutical Collection Events Sponsored by Class 3A Facilities/Programs

A facility/program licensed by the Department of Health as a Class 3A Institutional Dispenser Limited may sponsor a pharmaceutical collection event to manage the disposal of pharmaceutical waste subject to the following conditions:

- ✓ Each event must be open to households and publicized accordingly. At the discretion of the sponsoring facility/program, the event may be open to other Class 3A facilities/programs.
- ✓ Pharmaceuticals surrendered by Class 3A facilities/programs must be kept segregated from the waste surrendered by the public.
- ✓ No Class 3A facility/program may dispose of **any** pharmaceutical waste that is classified as hazardous, including conditionally exempt small quantity generator (CESQG) waste, at a collection event sponsored by a Class 3A facility/program. Pharmaceuticals generated by a facility/program that are classified as hazardous wastes are subject to applicable Department of Environmental Conservation regulations. All generators of solid waste are responsible for determining whether the waste is hazardous.
- ✓ Each event sponsored by a Class 3A facility/program requires a separate Department of Health Bureau of Narcotic Enforcement approval and a variance granted by the Department of Environmental Conservation.
- ✓ The sponsoring Class 3A facility/program must obtain written approval from the disposal facility to dispose of surrendered pharmaceuticals.
- ✓ Class 3A facilities/programs seeking to dispose of pharmaceutical waste by sponsoring or participating in a pharmaceutical collection event must complete and submit to the applicable Bureau of Narcotic Enforcement office the requisite disposal/destruction forms identifying all controlled substances to be surrendered at the event.

Submit the application, along with any other documentation required, addressed to:

New York State Department of Health
Bureau of Narcotic Enforcement
Riverview Center
150 Broadway
Albany, New York 12204

Questions?? Call 1-866-811-7957 (Option #4)

www.health.ny.gov/professionals/narcotic/

New York State Department of Health
Bureau of Narcotic Enforcement
Riverview Center
150 Broadway
Albany, New York 12204
1-866-811-7957 (Option #4)

New York State Department of
Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Solid Waste, Reduction
and Recycling
625 Broadway, 9th Floor
Albany, New York 12233-7253
(518) 402-8678

U.S. Department of Justice
Drug Enforcement Administration
New York Division
99 Tenth Avenue
New York, New York 10011
(212) 274-4520