



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 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. Schedule I drugs will be handled on a case-by-case basis.

Applicability

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

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 the request, the Department of Environmental Health and Radiation Safety (EHRS) will electronically send the requestor within 72 hours the Request for Incineration Forms.
5. The requestor must complete the forms including registrant name, DEA registration number, number of packages, package size, substance name, strength, NDC Number, and DEA Schedule. The requestor submits the form to the [EHRS](#) for processing.
6. The Department of Environmental Health and Radiation Safety will send the completed form to the waste vendor for DEA approval. The approval process usually takes **two weeks**.
7. Upon DEA approval, the waste vendor will provide the EHRS a date for pick-up and disposal.



Department of
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Safety**

8. The Department of Environmental Health and Radiation Safety will notify the requestor the date of pick-up. The registrant must be present during the pick-up of the substance or substances.
9. **The Department of Environmental Health and Radiation Safety is not permitted to take possession, handle, or destroy control substances.**

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.
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 Radiation Safety is not permitted to take possession, handle, or destroy controlled substances.**

Recordkeeping

1. The Department of Environmental Health and Radiation Safety will maintain all transfer paperwork for disposals associated with current DEA Registrants.
 - a. A copy of the destruction manifest 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.

