Michelle and Jim –

Thanks so much for coming in to meet with us on Monday and for expressing your members’ interest in helping to destroy pharmaceuticals collected by law enforcement in an environmentally protective manner.  As promised, we are providing three pieces of information. We hope that this is just the start of the conversation.

1. Attached is a list of DEA registered reverse distributors, as of January 2019. There are 63 locations in 23 states. In many cases, the DEA reverse distributors are in the same states as the RCRA-permitted cement kilns (although we note that the DEA regulations do not prohibit law enforcement from taking it to a DEA registered reverse distributor that is out of state).
2. Attached is a literature review that EPA conducted regarding the make-up of collected household pharmaceuticals. Since 2014, the DEA regulations now prohibit inventorying the collected pharmaceuticals, so these sources are several years old. The studies vary in their approach and methodology, but they provide a sense of they types of items collected.
3. CVS Pharmacy currently operates a program that makes pharmaceutical collection receptacle kiosks available to law enforcement agencies. Between 2014 and 2016, CVS Pharmacy placed 626 collection receptacle kiosks in police departments in 42 states and collected data on the volume of household pharmaceuticals that were collected. CVS Pharmacy reported that the law enforcement agencies collected over 47 metric tons (52 tons) of pharmaceuticals in that time period. Thus, on average, the participating police departments collected approximately 166 pounds per police department every 2 years, or 83 pounds annually. (Source of info: “CVS Health Announces 47 Metric Tons of Unwanted Medication Collected Through Safe Drug Disposal Program” available at: <https://cvshealth.com/newsroom/press-releases/cvs-health-announces-47-metric-tons-unwanted-medication-collected-through>)

Kristin

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

Kristin Fitzgerald

U.S. Environmental Protection Agency

Office of Resource Conservation & Recovery

Materials Recovery & Waste Management Division

Recycling & Generator Branch

phone:  703-308-8286

work schedule:  Monday - Thursday