

FAWK'S NEWS

Medication Waste in the Ambulatory Surgery setting

Medication Waste Compliance

A Practical Guide for Ambulatory Surgery Centers (ASCs)

You aren't imaging it!

Multiple agencies regulate different waste types leaving the regulations surrounding medication waste fragmented and confusing in ASCs.

What applies to ASCs, which rules matter most and how to stay compliant while optimizing cost savings.

Why Medication Waste Compliance Matters

Improper handling of medication-related waste can lead to:

- Staff exposure risks
- Diversion concerns
- Regulatory citations (CMS, AAAHC, Joint Commission)
- Increased disposal costs

Every ASC is responsible for managing medication waste from the moment it is generated until final disposal, regardless of who removes it from the building.

Medication Waste Commonly Generated in ASCs

Surgery centers most often generate:

- Partially used or wasted perioperative medications
- Expired medications
- Controlled substances (e.g., fentanyl, morphine, ketamine)
- *Some* Hazardous waste pharmaceuticals
- Non-hazardous pharmaceutical waste
- Sharps and medication delivery devices

Each of these waste streams is regulated differently, which is where most compliance confusion occurs.



FAWKS Call to Action!

Do not throw medications in the trash! Seriously - Don't do it

- 1) Determine if you will be segregating hazardous waste from non-hazardous waste OR considering all medication waste hazardous
- 2) Create a hazardous waste determination if you are segregating, otherwise, don't
- 3) Controlled substances need to be rendered irretrievable first THEN picked up as medication waste (NEVER trash)



Understanding Which Rules Apply

Medication waste is governed by different agencies depending on classification:

Waste Type	Primary Oversight
Controlled substances	DEA
Hazardous waste pharmaceuticals	EPA & Health Dept.
Non-hazardous pharmaceutical waste	Health Dept. (Solid/Medical Waste)
Sharps & infectious waste	OSHA & Health Dept.

Non-Hazardous Pharmaceutical Waste

Most routine perioperative medications fall into this category.

Hazardous Waste Pharmaceuticals

Some medications meet the definition of hazardous waste under state and federal law. It is the responsibility of the generator to determine which medications are hazardous.

Very Small Quantity Generators (VSQGs): What Most ASCs Are

Most ambulatory surgery centers qualify as Very Small Quantity Generators (VSQGs) of hazardous waste.

As long as a VSQG stays below federal quantity limits and manages waste safely, federal hazardous waste regulations do not impose a storage time limit.

Controlled Substances

Controlled substances are regulated only by the DEA, not as medical or hazardous waste. Render waste irretrievable first THEN remove as hazardous or non-hazardous waste (NOT trash).