Waste Disposal of Controlled Substances

Disposal of expired, damaged, or otherwise unusable controlled substances (CS) follows concise procedural steps and is strictly regulated by the DEA. EHS contracts with a licensed, reverse distributor to properly dispose of the controlled substances in accordance with DEA mandates.

Note that all DEA registrants must have an up-to-date DEA registration and Controlled Substance Use Authorization (CSUA) when in possession of any controlled substance.

**WHEN IS DISPOSAL OF CS NECESSARY?**
Disposal is necessary when the:

- Controlled substances are expired, unwanted, or no longer required for the research project.
- Research project is closed or terminated and the controlled substances remain in possession of the Authorized User.
- DEA license or CSUA is about to expire and will not be renewed.
- DEA Registrant terminates employment.

**HOW DO I DISPOSE OF EXPIRED/UNWANTED CS?**
1. Complete, scan to PDF, and email ehs-cs@usc.edu the following forms:
   - Controlled Substance Waste Disposal Request Form (CS form G).
   - Controlled Substance Use and Disposal Log (CS form B) for each controlled substance to be disposed of.
2. EHS will create an account for the DEA registrant with the reverse distributor if one is not yet established.
   - Request DEA form 222 for disposal of Schedule II drugs.
3. The DEA registrant will be notified by EHS when the account is established to coordinate CS packaging, shipment, and disposal, and to provide further instruction.
   - A Chain of Custody form will be established and signed when CS is transferred.
4. EHS will notify the DEA registrant when CS is successfully delivered to the reverse distributor.

**WHAT I NEED TO KNOW...**
- Keep CS Usage and Disposal logs for at least three years following disposal.
- Do not dispose of vials containing CS [content present in container] in a regular trash bin or commingle with other chemical waste.
- Contact ehs-cs@usc.edu for CS waste disposal and general CS information.

**HOW DO I DISPOSE OF PRECURSOR CHEMICALS?**
Unused/expired precursor chemicals must be disposed of as hazardous chemical waste. Refer to the Hazardous Waste Disposal Fact Sheet for more information.

**WHAT ARE DISPOSAL OPTIONS FOR EMPTY CS VIALS?**
There are 2 options for disposing of empty CS vials:
- Option 1: Deface label on vial and discard in regular trash.
- Option 2: Discard in pharmaceutical waste container.

**ARE THERE EXCEPTIONS?**
Yes. A CS spill as a result of a broken or damaged container will be treated as a hazardous chemical spill.

2. Consult the Safety Data Sheet of the CS for pertinent information.
3. Update the Usage and Disposal Log to reflect the loss of material.
4. Request a hazardous waste pick-up online.
5. Document the incident by completing the Controlled Substance Incident Report (CS Form F). Email completed form to ehs-cs@usc.edu.

**REFERENCES**
21 CFR Parts 1300 - end
Federal Register Volume 79, No. 174 September 2014, Part II