**NSC Technical Subcommittee Call Minutes – August 20, 2019**

**Participation [by regions]:**

2: Edward Bakos – **NJ**

3: Lee Ann Briggsand Jeremy Hancher**– PA**

4: Donovan Grimwood – **TN**, Jack Porter – **SC**, Derek Bozzell – **KY**, Melissa McGee-Collier & Trayce Moore-Thomas – **MS** and Jim Grassiano – **AL**

5: Lisa Ashenbrenner-Hunt & Jennifer Feyerherm & Emily Ohde - **WI** and Hani Sharaya, Angela Taylor & Mark Stoddard - **IN**

7: Nany Larson, Allison Crowther & Lynelle Ladd – **KS**, K. Fenatic (TX)

8: Alex Helling - **CO**

10: Belinda Breidenbach – **ID**

**Other:** Luke Hershey, A. Taylor, R. Costiga, Brian Knieser (EPA), Kristin Fitzgerald (EPA), Laura Stanley (EPA)

**July minutes:** approved as is

**Tech-Subcommittee:** <https://nationalsbeap.org/sbeap/resources/subcommittees/technical>

***This presentation was recorded and will be posted to the SBEAP Technical Subcommittee web page***

**Management Standards for Hazardous Waste Pharmaceuticals**

**Kristin Fitzgerald & Brian Knieser, US EPA Office of Resource Conservation and Recovery**

**(**[**fitzgerald.kristin@epa.gov**](mailto:fitzgerald.kristin@epa.gov)**) &** [[**Knieser.Brian@epa.gov**](mailto:Knieser.Brian@epa.gov)](mailto:Knieser.Brian@epa.gov)

**Kristin Fitzgerald** has been with the Agency for eighteen years, working primarily on hazardous waste generator issues. Kristin started working on RCRA twenty-nine years ago – answering questions on the RCRA/Superfund Hotline. Prior to joining EPA she worked as a consultant to the EPA and the Department of Energy and conducted research on the effects of elevated carbon dioxide on wetland plants while managing a laboratory at a University.

She holds a B.A. in Government from St. Lawrence University in New York and an M.S. in Environmental Science and Policy from George Mason University in Virginia.

**Brian Knieser** started at EPA in 2016 in the hazardous waste recycling and generator program. Since then he has primarily worked on the Management Standards for Hazardous Waste Pharmaceuticals rulemaking, and implementation of the Hazardous Waste Generator Improvements rule. He has a B.S. from the College of William & Mary, and an M.S. from Johns Hopkins University.

**Some take aways:**

**Sewer ban takes effect on Wednesday, August 21, 2019 throughout the United States**

**Vape Shops**

An Electronic Nicotine Delivery System establishment and would be regulated under 40 CFR 266 Subpart P

They can sell pre-mixed products or mix/prepare starting with a higher concentration of Nicotine (**P001**). Mixing/preparing preparing onsite has greater potential to generate a P075 hazardous than from pre-mixed products

They are or will be regulated by FDA (Food & Drug Administration)

Some pharmacies may sell pre-mixed Nicotine products.

EPA is planning on developing guidance for vape shops.

**Long term care**

Can return used & unused [hazardous] waste pharmaceuticals to their pharmacy

Any remaining product, such as Lindane (**U129**) used in lice treatment, would be a hazardous waste pharmaceutical unless it can be fully used.

**VSQG – Very Small Quantity Generator**

If the VSQG status can be maintained, 40 CFR 266 Subpart P would not be an obligation.

Subject to the ban on discharging hazardous waste pharmaceuticals to a collection system which leads to a wastewater treatment plant.

**Definition of an empty container** – practices used to remove or fully administer a pharmaceutical from a bottle, syringe, bag or similar container. Containers such as tube containing a paste, gel, cream, etc. cannot be considered empty.

**Training** need not be documented to comply with 40 CFR 266 Subpart P. However, it is performance based. It would require a responsible individual to be aware of what is and is not a hazardous waste [pharmaceutical].

**Comingling** of hazardous & non-hazardous waste is allowed under 40 CFR 266, Subpart P as long as the waste is compatible.

**One time notifications online** - <https://rcrainfo.epa.gov/rcrainfoprod/action/secured/login>

**Additional training** conducted in various locations starting in New Jersey on October 9, 2019

**Hazardous Waste Pharmaceuticals users (compliance) group** meets on the 3rd Tuesday of the month starting at 1:30 pm EST. Contact Brian for information or to join.

**Future topics:**

* **September 17:** Energy Extraction Portal - George Cushnie, Compliance Assistance Center and Catherine Tunis, EPA OECA
* **October 15:** Environmental Impacts from Cannabis production and distribution – Kaitlin Urso, CO
* **November 19:** Surface Coating MACT updates overview & discussion on recordkeeping/reporting, David Darling, American Coatings Association
* **December 17:** to be determined

**Next Call: September 17, 2019**

1 pm CST (2 pm EST) (3rd Tuesday of month)