

Dispose of Controlled Substances

Proper disposal of controlled substances is important to reduce the risk of diversion and ensure safety and security within the laboratory or registered storage location.

Expired/unwanted controlled substances

Controlled substances that are expired, unwanted, or damaged (i.e., unused vials, expired dilutions, or broken/damaged containers with recoverable contents) **must** be transferred to a reverse distributor for destruction. U-M Environment, Health & Safety (EHS) [formerly OSEH) contracts with Drug and Laboratory Disposal (DLD) for reverse distribution.

1. Clearly label the substances for disposal (e.g., “to be disposed”, “do not use”, or “expired”).
2. Segregate the substances labeled for disposal from remainder of inventory within the secure storage location (i.e., safe, lock box).
3. Complete and submit the [DLD Controlled Substance Inventory List](#) to EHS – Hazardous Materials. See the DLD [instructions](#) for help with the form.
4. Submit the Inventory List form either by:
 - a. Scanning the completed form and emailing it to EHS, or
 - b. Completing the form [online via the EHS Waste and Supply Request webpage](#).
5. If disposing of Schedule I or Schedule II drugs, upon substance pickup:
 - a. Review the *DLD Chain of Custody Form* (provided by DLD) for accuracy
 - b. Review the *DEA Form 222* provided by DLD for accuracy (including **Purchaser** section)
 - c. Complete the **Supplier section** of the *DEA Form 222*
 - d. Separate the *DEA Form 222* copies. Retain and file **Copy 1** (brown Supplier copy) with the DEA Registrant’s controlled substance records. Give Copy 2 (green DEA copy) to the EHS representative.
6. Sign the *DLD Chain of Custody Form* upon substance pickup, make a copy, and file it with the controlled substance records maintained the DEA Registrant.
7. Record the disposal on the applicable inventory and usage log, and zero out the remaining balance.

U-M EHS – Hazardous Materials

- Phone: (734) 763 – 4568
- Email: OSEHControlledSubstanceDisposal@umich.edu

EHS contacts you to schedule a pickup date/time upon receipt of a completed DLD Controlled Substance Inventory List.

An EHS representative must accompany the DLD representative on controlled substance pickups.



If either form contains errors. Void the form and immediately create a new form.

Laboratory self-disposal (“non-recoverable” contents)

During the normal course of controlled substance administration and usage, used (empty) vials and syringes may contain residual amounts of **non-recoverable** waste. These items may be discarded into a biohazardous sharps container. There is no need to record disposal on the usage log, as long as contents are **non-recoverable** (e.g., contents cannot be drawn out with a syringe) and when disposing of empty containers, the usage log balance is zeroed out.

Waste (“recoverable” contents)

Using controlled substances in a laboratory procedure may result in **recoverable** waste amounts from unused doses in a syringe (e.g., 5 ml was drawn out of a vial or dilution, but only 4 ml was administered) or from container spillage. The use of Rx Destroyer (RxDestroyer.com) is the **only** approved method of laboratory self-wasting.



Unacceptable wasting methods include the use of blue pads, the laboratory sink, cat litter, wasting into animals or into a sharps container.

If recoverable waste remains from unused volume in a syringe:

1. Record waste amount on corresponding use log *and* on DEA Form 41.
2. A witness must be present to observe the waste and to document (initial) on the use log.
3. Once contents are wasted into the Rx Destroyer bottle, shake the bottle several times to activate the ingredients.
4. Once the bottle contents have reached the fill line, the hardener pellet may be used to solidify the contents, and the bottle can be discarded into the regular trash.

If recoverable waste remains from container spillage (e.g., puddle on the bench top)

1. Place cleanup refuse (e.g., paper towels) from a spilled container into a secure biohazard or biohazard sharps container.
2. Record spillage amount on the usage log and [DEA Form 41](#). (See DEA [instructions](#).)

Notes:

- **Two** authorized personnel (one being the registrant *or* an authorized agent) must perform the waste and witness that waste on the use log and the DEA Form 41.
- If you do not want to self-waste, OSEH can be used to collect **all** recoverable controlled substances.