

VERMONT AGENCY OF NATURAL RESOURCES  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION, WASTE MANAGEMENT & PREVENTION DIVISION  
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Checklist - Hazardous Waste Pharmaceuticals

Ok	Not Ok	NA	Question
			Has the healthcare facility notified the Secretary using the Hazardous Waste Handler Site Identification Form (EPA Form 8700-12)? <b>7-1003(a)(1)</b>
			Are all personnel that manage non-creditable hazardous waste pharmaceuticals thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities? <b>7-1003(b)</b>
			If the healthcare facility generates a waste that is a non-creditable pharmaceutical, have they determined if that pharmaceutical is a hazardous waste pharmaceutical? <b>7-1003(c)</b>
			Are non-creditable hazardous waste pharmaceuticals in a container that is structurally sound, compatible with its contents, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions? <b>7-1003(d)(1)</b>
			If the healthcare facility manages ignitable or reactive non-creditable hazardous waste pharmaceuticals, are the containers managed safely and in a way that does not damage the structural integrity of the container? <b>7-1003(d)(1)</b>
			Are containers of non-creditable hazardous waste pharmaceuticals closed and secured in a manner that prevents unauthorized access to its contents? <b>7-1003(d)(3)</b>
			Are containers of non-creditable hazardous waste pharmaceuticals labeled with the phrase "Hazardous Waste Pharmaceuticals?" <b>7-1003(e)</b>
			Can the healthcare facility demonstrate the length of time that the non-creditable hazardous waste pharmaceuticals have been accumulating? <b>7-1003(f)(2)</b>
			Has the healthcare facility complied with land disposal restrictions? (It is not required to identify hazardous waste codes on LDR notification for non-creditable hazardous waste pharmaceuticals) <b>7-1003(g)</b>
			Has the healthcare facility kept a copy of each non-creditable hazardous waste manifest for three years? <b>7-1003(j)(1)</b>
			Are copies of test results, waste analyses, or other determinations that support its hazardous waste determinations kept for three years? <b>7-1003(j)(3)</b>
			Have spills of non-creditable hazardous waste pharmaceuticals been immediately contained and handled in accordance with the requirements of this subchapter? <b>7-1003(k)</b>
			Has the healthcare facility determined whether the potentially creditable pharmaceutical is a potentially creditable hazardous waste pharmaceutical? <b>7-1004(a)</b>

Ok	Not Ok	NA	Question
			Has the healthcare facility avoided sending hazardous wastes other than potentially creditable hazardous waste pharmaceuticals to a reverse distributor? <b>7-1004(c)</b>
			Has the healthcare facility kept the appropriate records for three years when shipping potentially creditable hazardous waste pharmaceuticals to a reverse distributor? <b>7-1004(e)</b>
			Have spills of potentially creditable hazardous waste pharmaceuticals been immediately contained and handled in accordance with the requirements of this subchapter? <b>7-1005(f)</b>
			Have ALL healthcare facilities avoided discharging hazardous waste pharmaceuticals to a sewer? <b>7-1006</b>
			Are containers with hazardous waste pharmaceuticals remnants managed properly? <b>7-1008(d)</b>
			Has the healthcare facility met the manifest requirements? (a shipment of non-creditable hazardous waste pharmaceuticals must have the word "PHRM" in Item 13 of EPA Form 8700-22) <b>7-1009(a)(2)</b>
			If the healthcare facility no longer operates under this subchapter did they notify the Secretary using the Hazardous Waste Handler Site Identification Form (EPA Form 8700-12)? <b>7-1003(a)(2)</b>
			Are non-creditable hazardous waste pharmaceuticals accumulated on site for one year or less? <b>7-1003(f)(1)</b>
			Did the healthcare facility properly conduct exception reporting for missing manifest copies? <b>7-1003(i)(2)</b>
			Has the healthcare facility kept a copy of each exception report for three years? <b>7-1003(j)(2)</b>
			Has the healthcare facility met the pre-transportation requirements for transporting or offering for transport off-site a non-creditable hazardous waste pharmaceutical? <b>7-1009(a)(1)</b>