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 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).
4. Email a completed DLD Controlled Substance Inventory List to OSEH (address shown to the right). See the DLD instructions for help.
5. Obtain a signed copy of the DLD Chain of Custody Form from OSEH upon substance pickup, and file with the controlled substance records.
6. Record the disposal on the applicable inventory and usage log, and zero out the remaining balance.

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.

Contact Information

U-M OSEH – Hazardous Materials

• Phone: (734) 763 – 4568
• Email: OSEHControlledSubstanceDisposal@umich.edu
4. Once the bottle contents have reached the fill line, the hardening powder 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.