# How do I manage my dangerous waste pharmaceuticals?

## Start here.

Count your dangerous waste pharmaceuticals and nonpharmaceutical dangerous waste together each month to determine if the special requirements in WAC 173-303-555 apply to your facility.

## If your monthly total is…

* ≤ 2.2 pounds of dangerous waste with a QEL of 2.2 pounds,
* ≤ 220 pounds of dangerous waste with a QEL of 220 pounds, or
* ≤ 220 pounds of residue from a cleanup of 2.2-pound QEL waste…

## You can choose to either:

* Manage your dangerous waste pharmaceuticals under the special requirements and nonpharmaceutical dangerous waste under the small quantity generator requirements, or
* Manage all dangerous waste under the standard requirements small quantity generator requirements.**​​**

Stop here.

## If your monthly total is…

More than any of these listed limits (above), then the special requirements apply. You must notify Ecology within 60 days of being subject to the special requirements. Count your nonpharmaceutical dangerous waste to determine your generator category. This category determines the management requirements for nonpharmaceutical dangerous waste.

## Do both of the following:

* Manage your dangerous waste pharmaceuticals under the special requirements, and
* Mange all nonpharmaceutical dangerous waste under the standard requirements for your generator category.

Stop here.

## What are QELs?

QEL stands for quantity exclusion limit. A QEL is [a monthly weight limit](https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Dangerous-waste-basics/Generator-category#GenTable)[[1]](#endnote-1) based on the type of waste you’re counting.

* Most dangerous wastes have a QEL of 220 pounds.
* Dangerous wastes that are toxic in small amounts have a QEL of 2.2 pounds.

Find examples of dangerous waste pharmaceuticals on the [common pharmaceutical wastes webpage](https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Pharmaceutical-waste/RCRA-waste-codes).[[2]](#endnote-2)

## Determining your generator category

Your generator category tells you which dangerous waste rules to follow. Remember that your generator category may change from month to month. Visit our [generator category webpage](http://Ecology.wa.gov/generatorstatus)[[3]](#endnote-3) for details.

## Need more help?

* See our [pharmaceutical waste management](https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Pharmaceutical-waste/Management-options)[[4]](#endnote-4) webpage for more information.
* See the special requirements for managing dangerous waste pharmaceuticals in [WAC 173-303-555](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-555).[[5]](#endnote-5)

## Resources

* Special requirements: [WAC 173-303-555](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-555).[[6]](#endnote-6)
* Nonpharmaceutical dangerous waste management requirements for LQGs: [WAC 173-303-200](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-200).[[7]](#endnote-7)
* Nonpharmaceutical dangerous waste management requirements for MQGs: [WAC 173-303-172](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-172).[[8]](#endnote-8)
* Nonpharmaceutical dangerous waste management requirements for SQGs: [WAC 173-303-170(2)(a)(i)](https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-170)[[9]](#endnote-9) and [WAC 173-303-171](https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-171).[[10]](#endnote-10)

Image courtesy of FreePik.com.

Publication 21-04-022

To request an ADA accommodation, contact Ecology by phone at 360-407-6700 or email at hwtrpubs@ecy.wa.gov, or visit https://ecology.wa.gov/accessibility. For Relay Service or TTY call 711 or 877-833-6341.

1. https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Dangerous-waste-basics/Generator-category#GenTable [↑](#endnote-ref-1)
2. https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Pharmaceutical-waste/RCRA-waste-codes [↑](#endnote-ref-2)
3. http://ecology.wa.gov/generatorstatus [↑](#endnote-ref-3)
4. https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Pharmaceutical-waste/Management-options [↑](#endnote-ref-4)
5. https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-555 [↑](#endnote-ref-5)
6. https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-555 [↑](#endnote-ref-6)
7. https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-200 [↑](#endnote-ref-7)
8. https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-172 [↑](#endnote-ref-8)
9. https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-170 [↑](#endnote-ref-9)
10. https://app.leg.wa.gov/WAC/default.aspx?cite=173-303-171 [↑](#endnote-ref-10)