



American International Plaza, Suite 1400
250 Muñoz Rivera Avenue
San Juan, PR 00918
Tel. 787.759.8000 ≈ 1.866.284.0708
Fax 787.767.9333

Gretchen Mendez-Vilella, Esq.

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EPA publishes a Draft Guidance Document aimed at the Hospital, Medical and Veterinary Communities



The United States Environmental Protection Agency (“EPA”) recently published a draft guidance document entitled **“Best Management Practices for Unused Pharmaceuticals at Health Care Facilities”** in response to the discovery of pharmaceuticals at very low concentrations in the U.S. waters. This guidance is aimed at promoting proper pharmaceutical management practices at hospitals, medical clients, doctor’s offices, long-term care facilities and veterinary facilities to reduce any impact which may be caused by the mentioned sectors.

The draft guidance contains recommendations the EPA developed after conducting numerous site visits, consulting with certain of the mentioned sectors, and reviewing hospital disposal data on unused pharmaceuticals. The practices are a combination of the recommended and implemented practices and intend to deal with proper unused pharmaceutical management and disposal.

We at Goldman remain committed in assisting you and your business to adjust to changes in the law. For further information you may contact *Gretchen Mendez* at 787.759.4207 (gmendez@gaclaw.com); or *Alicia Lamboy* at 787.759.4144 (alamboy@gaclaw.com).

The proposed practices address:

- Inventory and purchasing controls
- Practices for identifying and managing these types of wastes
- Waste minimization practices
- Unused pharmaceuticals disposal practices to comply with applicable Federal and State disposal regulations

EPA is requesting public comments to this guidance. Comments must be submitted by **November 8, 2010**. Comments received after this date may not be incorporated into the final guidance document, which is planned to be published in late 2010.

For further information concerning this matter, and specifically on how to obtain a copy of the guidance or submit comments to the same, you may contact us at your convenience.

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