

Controlled Substances SOP 03: Receipt of Controlled Substances for Disposal**1. Purpose**

This procedure describes internal procedures for the transfer of controlled substances from the laboratory to the Central Custodian for storage prior to disposal.

2. Regulatory References

None

3. Training Requirements

All Controlled Substances SOP.

4. General Information**A. Abbreviations:**

- 1) Central Controlled Substances Custodian (CCSC)
- 2) Controlled Substance (CS)
- 3) Controlled Substances Tracking System (CST)
- 4) Environmental Health and Safety (EHS)
- 5) Institute Point of Contact, Director of Research Compliance (IPOC)
- 6) Laboratory Controlled Substances Custodian (LCSC)
- 7) Office of Laboratory Animal Resources (OLAR)
- 8) Office of Research Compliance (ORC)
- 9) Uniform Distribution, Transfer, and Disposal Form (UDTD)

B. Caltech has two DEA licenses and each license has its own CCSC, who is responsible for training personnel and managing CS inventory on their respective licenses.

5. Procedure

A. Only the research laboratory's LCSC may deliver CS to the CCSC for disposal.

B. When research laboratories return CS for disposal (Waste CS), the CCSC for the respective license will receive the controlled substances and review the UDTD to ensure that the CIT number on the bottle matches the UDTD.

1) If a research laboratory has created aliquots of either the undiluted controlled substance or an efficacious human dose of controlled substance, all aliquots should be presented for disposal. The number of aliquots taken should be indicated on the UDTD form. The CCSC will verify the number of aliquots listed on the UDTD form with the log book to ensure all aliquots are accounted for prior to receipt for disposal.

C. Upon request for disposal of a CS from the LCSC, the CCSC shall:

- 1) Arrange a time for pick-up and request that the original UDTD and logbook be presented at the time of the disposal pickup.

- 2) Inspect the bottle to verify the amount of material left in the CS bottle matches the item on the UDTD; indicate if empty. If the amount of CS is inconsistent, initiate an investigation to determine the cause of the difference and notify the IPOC of the discovery.
 - 3) Ensure that the UDTD includes the remaining amount of the CS in the stock containers and confirm that this is consistent with each container (each CN) in the logbook.
 - 4) Review the UDTD to ensure that the CIT number on the bottle matches the UDTD.
 - 5) Sign the logbook to verify that the container was picked-up.
 - 6) Upon verification, have the LCSC sign the UDTD and then sign the UDTD as the CCSC.
 - 7) Take custody of the controlled substance bottle (Waste CS).
 - a. Do not pick-up broken glass ampoules for disposal, due to the sharps hazard. Pick up the original box or secondary container in lieu of the ampoule.
 - b. For carpject syringes, or other syringes, remove the needle (with cap in place) and discard in sharps container. Keep the original syringe for CS disposal.
 - c. For items that have permanently attached needles, dispense item into a secondary container (e.g. red top tube) and label the secondary container with the contents and tracking number prior to removal. Discard the original container with the attached needle in an appropriate sharps container.
 - d. Where there are aliquots as discussed above, all aliquots will be treated under the same CIT number and as one “container” for the purposes for disposal from this step forward.
- D. The CCSC should transfer the Waste CS from the lab back into the CCSC lockbox/safe (CCSC Holding/Disposal Pickup). Note: A new requisition number will be created once transferred.
- 1) The Waste CS will be maintained in the CCSC Holding/Disposal Pickup until transferred to the disposal inventory central location in the Disposal Storage Area. (The Waste CS can also be immediately transferred to Disposal Storage Area.)
 - Keep empty Waste CS bottles separate from non-empty bottles.
 - 2) As needed, or once the CCSC Holding/Disposal Pickup area is full, transfer the substances to Disposal Storage Area.
 - a. Each CCSC will be responsible for their own Waste CS in the Disposal Storage Area.
 - b. When the CCSC is ready to move the waste controlled substances from their CCSC Holding/Disposal Pickup area (i.e. their respective safes) to the Disposal Storage Area, the CCSC will verify Waste CS inventory against the UDTD in preparation to transfer to the Disposal Storage Area.
 - c. When there is sufficient quantity for destruction, CCSCs will follow the SOP #4 *Removal of Controlled Substances from Caltech* for the removal.
- E. The CCSC shall document disposal as follows:
- 1) Update CS Disposal Inventory Spreadsheet in SharePoint, under the appropriate license tab. Ensure that all the required information regarding the waste controlled substance and container are documented.
 - 2) Log on to the CST and transfer the Waste CS from the lab to the CCSC Waste Area in the system.
 - a. In the CST, search for the CN number of the disposed item(s) and then click on the Requisition number to bring up the CS Order.

- b. Click on the CS Unit List at the bottom of the order information. Check the boxes corresponding to the items for disposal and then click “Transfer”. Under “transfer order type” check “inventory”.
 - i. Change the information to correspond to the date the LCSC transfers the substance to the safe (CCSC Holding/Disposal Pickup Area) and in the “authorization note”, indicate “for disposal”.
 - ii. After transferring the Waste CS from the lab to the CCSC Holding/Disposal Pickup Area, update the order status to “Disposal Pick-Up”.
 - iii. After transferring the Waste CS from the CCSC Holding/Disposal Pickup Area, change the status of the Waste CS in the CST from “Disposal Pickup” to “Disposal Storage” (in Disposal Storage Area).
 - iv. After Removal of CS from Caltech is complete and a Certificate of Destruction is received, change the CS status in the CST to “Closeout.” Keep the Certificate of Destruction for a minimum of two years.
- 3) Maintain a copy of each UDTD in the OLAR or EHS office for a minimum of two years after disposal (removal from Caltech) of the CS.
 - a. Previously maintained copies of the UDTD can be discarded once the vial has been transferred to the Disposal storage (Mead Shed).
 - b. A copy of the UDTD (signed for disposal) is then maintained for at least 2 years.