

City of Palo Alto

Public Works Department

March 20, 2007

Director John P. Walters
Office of National Drug Control Policy
P.O. Box 6000
Rockville, MD 20849-6000

RE: Comments on February 2007 Federal Government Guidelines for Proper Disposal of Prescription Drugs

Dear Director Walters,

Divisions

Administration
650.329.2373
650.329.2299 fax

Engineering
650.329.2151
650.329.2299 fax

Environmental
Compliance
650.329.2598
650.494.3531 fax

Equipment
Management
650.496.6922
650.496.6958 fax

Facilities
Management
650.496.6900
650.496.6958 fax

Operations
650.496.6974
650.852.9289 fax

Regional Water
Quality Control
650.329.2598
650.494.3531 fax

We have just reviewed your agency's new "Federal Guidelines for the Proper Disposal of Prescription Drugs" and believe that the guidelines should be modified to state that Community Take-Back Programs are the preferred disposal method. We are also concerned that the affirmatively worded instruction to "*Flush prescription drugs down the toilet* only if the label or accompanying patient information specifically instructs doing so" will be misinterpreted by some readers. We are aware of no situations in which drugs should be flushed down the toilet. The City suggests that the existing language of the guidelines be revised as follows:

- "Take advantage of community pharmaceutical take-back programs that allow the public to bring unused, unneeded or expired prescription drugs to a central location for proper disposal. Some communities have pharmaceutical take-back programs or community solid-waste programs that allow the public to bring unused drugs to a central location for proper disposal. Where these exist, they are a good way to dispose of unused pharmaceuticals.

Or, if a take-back program is not available:

- Take unused, unneeded, or expired prescription drugs out of their original containers and throw them in the trash. Mixing prescription drugs with an undesirable substance, such as used coffee grounds or kitty litter, and putting them in impermeable, non-descript containers, such as empty cans or sealable bags, will ensure the drugs are not diverted.
- Do not flush prescription drugs down the toilet"

The City of Palo Alto operates a regional sewage treatment plant serving approximately 220,000 people, and has a strong interest in preventing pharmaceutical compounds from entering the sanitary sewer system. Many pharmaceuticals pass through sewage treatment plants, allowing them to affect aquatic life in our natural waterways. The City requests that ONDCP reissue its disposal guidelines to clarify that disposal at Community Take-Back Programs is the preferred disposal option. Feel free to contact Karin North at 650-494-7629 or Karin.North@cityofpaloalto.org to discuss our request.

Sincerely,



Phil Bobel
Manager, Environmental Compliance Division

P.O.Box 10250
Palo Alto, CA 94303