

# **P.S. Industries Inc.**

Reverse distributors in Washington are essential in the goal of removing unwanted prescription medications from the environment and promotion of safety from diversion and/or accidental ingestion by society.

Reverse distribution is a business to business removal of unwanted medications (especially controlled substances) through secure destruction. Without local reverse distribution, medical facilities will be in a “catch 22” with meeting state and federal regulations. Medical facilities are not permitted to dispose of their unwanted medications into the Drug Take Back program or into residential/business waste.

Currently, P.S. Industries Inc. (PSI) uses Spokane Waste to Energy facility (WTE) to economically accomplish secure destruction that’s meets Federal and State regulations. PSI has about 500 active customers (Medical Clinics, Veterinarians, Labs, Government and re-packagers) that securely destroy their unwanted medications through WTE facility in Spokane. The next closest facility that meets the Federal and State requirements for secure destruction is in Texas. Most out of state reverse distributors no longer reverse distribute controls due to 30 day time limits on storage implemented by the DEA a few years ago. If WTE in Spokane cannot be permitted as a large municipal waste combustor under 40 C.F.R. Part 60 or Part 62 then PSI will have to shut down because of the prohibitive costs and regulations necessary to securely destroy unwanted controls and non-controls. The result will be a substantial increase in unwanted medications being thrown away in residential/business waste. This will increase environmental damage and increase the risk of controlled substance diversion.

I respectfully request that you continue to allow Reverse Distribution and safe medication disposal as currently practiced in Washington by continuing to license an Incinerator that meets Federal and State requirements for secure destruction like WTE.