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Comments to the Texas Commission on Environmental Quality  
Pharmaceutical Disposal Advisory Group  
July 2, 2010

The Water Environment Association of Texas (WEAT) is a non-profit technical and educational organization whose members include scientists, engineers, utility managers, operators, and regulators. Collectively, our members are responsible for the design, operation and maintenance of wastewater collection and treatment and systems all across Texas. We are a state member association of the Water Environment Federation. Our goal is to promote sound science in environmental policy and regulation.

WEAT supported passage of SB 1757 and we believe that the approach for studying the issues surrounding the disposal of unused pharmaceuticals as outlined in the bill is necessary to determine the appropriate next steps. We support efforts to gather and share information from all stakeholders, and we believe that TCEQ is doing a good job of implementing the study as required by the bill.

Much research still needs to be done on the human health and environmental impacts of pharmaceuticals in treated water and ambient waters. Information is incomplete and WEAT advocates further research to better understand this evolving and complex issue. The assessment of risks to human health and the environment posed by exposure to any substance is fundamental to understanding and mitigating its potential impacts. Research efforts focused on the fate, transport, and effects of pharmaceuticals on human health and in the environment, although just beginning, are critical to understanding this complex issue. Any future regulatory requirements to address pharmaceuticals in the environment must be driven by sound scientific information. At this point in time, our industry does not have enough information to determine the risks posed by unused pharmaceuticals and what, if any, treatment options may be needed or may be effective in dealing with pharmaceuticals in wastewater.

In the absence of full and complete knowledge of the impact of pharmaceuticals in the water environment, we believe that the best option is to prevent as much as possible from entering wastewater treatment plants. Controlling unused pharmaceuticals at their source limits their release to the environment. Industry, agriculture, and the water and wastewater community should be active proponents of controlling pharmaceuticals at their point of generation to prevent harmful impacts. While we cannot control the human excretion component, we can control deliberate disposal into wastewater treatment plants.

Based on experiences of Texas wastewater utilities and on comments heard in these stakeholder meetings, WEAT has several recommendations for going forward on this issue:

- Texas should have an expedited process for collection of unused pharmaceuticals. The statutes and regulations involved with collection and handling of unused pharmaceuticals are confusing and unfamiliar to utilities. Statutes and regulations for handling and disposal of unused pharmaceuticals should be harmonized and simplified. Guidance documents should be developed for utilities or other public entities that wish to sponsor public collection events.
- Collection of unused pharmaceuticals from the public does not have to be solely the responsibility of water and wastewater utilities. While much of the burden of public collection events to date has fallen on public utilities, there may be other stakeholders that would be more appropriate parties for the collection of unused pharmaceuticals.
- A source of funding needs to be identified for collection of unused pharmaceuticals. Local governments have borne much of the expense to date for collection events. Funding for collection events will be an issue regardless of the entity providing the service.

Thank you for the opportunity to provide these comments. WEAT looks forward to continuing to work with TCEQ and other stakeholders to address the issue of disposal of unused pharmaceuticals in Texas.



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