PHARM TECH BASICS · ONE-PAGER

CMEA: Pseudoephedrine and Other Listed Chemicals

Which products are covered, behind-the-counter placement, daily and 30-day limits in base, tablet math, photo ID, the logbook, training and self-certification, and what to do when a sale goes over

24 sources + more detail
pharmtechbasics.com/sheets/pharm-cmea-pseudoephedrine.html
checked Nov 2026

1 What the CMEA covers

The Combat Methamphetamine Epidemic Act of 2005 (CMEA) sets federal rules for over-the-counter products that contain the List I chemicals ephedrine, pseudoephedrine or phenylpropanolamine, including their salts and isomers. These are 'scheduled listed chemical products' (SLCPs): they can be used to make methamphetamine illegally. Every pharmacy or store that sells them is a 'regulated seller'.

CHEMICAL	WHERE YOU SEE IT	STATUS
Pseudoephedrine	Decongestants (30 mg, 60 mg, 120 mg 12-hour) and '-D' allergy combinations	OTC, behind the counter
Ephedrine	OTC asthma tablets (ephedrine sulfate 25 mg, ephedrine HCl 12.5 mg)	OTC, behind the counter
Phenylpropanolamine (PPA)	None for people: FDA asked makers to stop selling it in 2000 (hemorrhagic stroke)	Veterinary prescription only
Phenylephrine ('PE' products)	Decongestants such as Sudafed PE	Not a listed chemical: CMEA does not apply

2 The limits (always in grams of base)

LIMIT	BINDS	RULE
3.6 g per calendar day	Every seller, including the pharmacy	Per purchaser, however many transactions
9 g per 30 days	The purchaser	A federal crime to buy more at retail
7.5 g of those 9 g	The purchaser	The most that may arrive by mail or carrier
7.5 g per 30 days	Mail-order sellers and mobile (kiosk) vendors	Their own 30-day sales limit

EXAM TIP Federal law is the floor. Many states set lower limits, add tracking or require a prescription; follow whichever rule is stricter.

3 Converting tablets to base

Labels give the salt (pseudoephedrine HCl). The limits count the base. Base = salt × 0.819 (about 0.82) for the HCl salt; × 0.771 (about 0.77) for a sulfate salt.

Round down. The counts match DEA's equivalency chart.

PRODUCT	BASE PER TABLET	MOST TABLETS IN 3.6 G	MOST TABLETS IN 9 G
Pseudoephedrine HCl 30 mg	30 × 0.819 ≈ 24.6 mg	3,600 ÷ 24.6 = 146.3 → 146	366
Pseudoephedrine HCl 120 mg	120 × 0.819 ≈ 98.3 mg	3,600 ÷ 98.3 = 36.6 → 36	91

- One 20-count box of 120 mg: 2,400 mg salt × 0.819 ≈ 1.97 g base. A second box the same day makes 3.93 g: over the limit, so one box only.
- One 24-count box of 30 mg: 720 mg salt × 0.819 ≈ 0.59 g base. Six boxes (3.54 g) fit in a day; a seventh does not.

SAFETY Do not divide 3.6 g by the salt strength. 3,600 ÷ 120 = 30 tablets is the classic wrong answer; the base math allows 36.

4 Making the sale

1. Take the product from behind the counter or a locked cabinet; customers never pick it up themselves.
2. Check a current photo ID issued by a state or the federal government (or another document on DEA's list). No ID, no sale.
3. Logbook: the purchaser enters name, address, date and time and signs; you enter the product name and quantity.
4. Confirm that the logbook name matches the ID and that the date and time are right.
5. Check the day's total for this purchaser, then hand the product directly to the person who signed.

Exception: a single package with no more than 60 mg of pseudoephedrine (one 60 mg or two 30 mg tablets) needs no logbook entry or ID.

5 When a sale would go over the limit

- Do not sell the part over the limit. Selling up to the limit is lawful; follow store policy.
- Do not ring it as a second sale or under another person's name. The 3.6 g counts every sale to that purchaser that day.
- Refuse when the ID is missing, does not match the logbook name, or the state system blocks the sale.
- Tell the pharmacist about a refused sale or a purchase pattern that looks like diversion.

SAFETY Choosing another decongestant for the patient is counseling: the pharmacist does it. The technician applies the limits and records the sale.

6 Behind the scenes

REQUIREMENT	FEDERAL RULE
Packaging	Tablets and gel caps only in blister packs, no more than 2 units per blister (unit-dose packets if blisters are not feasible)
Logbook	Paper (bound) or electronic; carries the false-statement warning; each entry kept at least 2 years; shown only to law enforcement
Training	Everyone who hands over the product or takes payment, using DEA's training content, before they sell
Self-certification	The seller certifies to DEA, online, for each location; renewed every year; certificate and training records kept
Theft or loss	Report unusual or excessive loss to DEA: by phone first, written report within 15 days (DEA Form 107)

7 Exam pearls

EXAM TIP 3.6 g a day, 9 g in 30 days, 7.5 g by mail; always as base. Logbook kept 2 years. Blister packs of no more than 2 units. Behind the counter or locked cabinet (mobile vendors: locked cabinet only). Self-certify every year, one certificate per store. Listed chemical losses go on DEA Form 107, not Form 106. Phenylephrine is not covered.

For education and exam preparation only. Not medical advice; follow current guidelines and your institution's protocols. Pharm Tech Basics is an independent study aid not affiliated with any certifying body.