



# A Product Stewardship Plan

## For Unwanted Medicine from Households

Alameda County, California  
February 15, 2019; Revised March 27, 2019

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## I. Introduction

MED-Project LLC (“MED-Project”), on behalf of the participating companies identified in [Appendix A](#), submits this Product Stewardship Plan (“Plan”) for Unwanted Medicine to the Alameda County Department of Environmental Health (“Department”) in compliance with the Alameda County Safe Drug Disposal Ordinance, Title 6 of the Alameda County Health and Safety Code Sections 6.53.010 through 6.53.120, as amended February 2, 2016 (“Ordinance”) and the Alameda County Safe Drug Disposal Regulations, as amended October 16, 2013 (“Regulations”). The Ordinance requires pharmaceutical Producers<sup>1</sup> to develop a Product Stewardship Program to finance and manage the collection, transportation, and disposal of Unwanted Medicine from Alameda County households.

## II. Contact Information

The primary contact person for MED-Project is:

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## III. Plan Definitions

**Board of Pharmacy** is the California State Board of Pharmacy.

**Call Center** is the MED-Project call center for Residents, which can be reached by callers at the toll-free number of 1-844-MED-PROJECT or 1-844-633-7765.

**Carrier** is the common carrier used to transport Unwanted Medicine from Kiosk Drop-Off Sites and/or Take-Back Events.

**County** means Alameda County, California.

**DEA** is the U.S. Drug Enforcement Administration.

**DEA Rule** is the DEA Final Rule, “Disposal of Controlled Substances,” 79 Fed. Reg. 53,520 *et seq.*, adopted on September 9, 2014.

**DOT** is the U.S. Department of Transportation.

**FDA** is the U.S. Food and Drug Administration.

**Help Desk** is the MED-Project call center and email-in database for Kiosk Drop-Off Sites that can be reached by callers at a toll-free number and/or by email at [alamedacounty@med-project.org](mailto:alamedacounty@med-project.org).

**Host-Assisted Collection Kiosk Drop-Off Site** is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine, where the Host-Assisted Collection Kiosk Drop-Off Site Host employees will remove, seal, and package boxes and inner liners.

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<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have their respective meanings set forth in the Ordinance and Regulations.

**Host-Assisted Collection Kiosk Drop-Off Site Host** is the designated contact person or persons at the Host-Assisted Collection Kiosk Drop-Off Site.

**Inhaler Mail-Back Services** is the provision of pre-paid, pre-addressed packages for the collection and disposal of inhalers (“**Inhaler Mail-Back Packages**”) by Vendor.

**Kiosk Drop-Off Site** is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine, including Host-Assisted Collection Kiosk Drop-Off Sites and Technician-Assisted Collection Kiosk Drop-Off Sites.

**Kiosk Drop-Off Site Host** is the designated contact person or persons at the Kiosk Drop-Off Site, including Host-Assisted Collection Kiosk Drop-Off Site Hosts and Technician-Assisted Collection Kiosk Drop-Off Site Hosts.

**Law Enforcement Agency** or **LEA** is a federal, state, tribal, or local law enforcement office or agency.

**Mail-Back Services** is the provision of pre-paid, pre-addressed containers, envelopes, or packages (“**Mail-Back Packages**”) to disabled and home-bound Residents or to persons providing services to such Residents for the collection and disposal of Unwanted Medicine by Vendor.

**Maintenance Technicians** are service personnel who are trained to provide services related to kiosks that are part of the Program. This includes, but is not limited to, responding to damaged kiosks.

**MED-Project Website** is the Internet website located at [www.med-project.org](http://www.med-project.org) or [www.medproject.org](http://www.medproject.org).

**Plan** or **Product Stewardship Plan** is the product stewardship plan presented in this submittal by MED-Project.

**Program** or **Product Stewardship Program** is the product stewardship program set forth in this Product Stewardship Plan.

**Residents** means human beings residing in the County. “Residents” does not include nonresidential generators of pharmaceutical waste, such as businesses, hospitals, clinics, doctor’s offices, veterinary clinics, pharmacies, or airport security and law enforcement drug seizures.

**Service Technicians** are personnel trained to service Program kiosks and/or Take-Back Events.

**Standard Mail-Back Services** is the provision of pre-paid, pre-addressed envelopes for the collection and disposal of Unwanted Medicine (“**Standard Mail-Back Packages**”) by Vendor.

**Specified Languages** are English, Spanish, Chinese, Vietnamese, and Tagalog (Filipino).

**Take-Back Event** is a one-day event at a location accessible to the public, conducted by MED-Project, with oversight by law enforcement, for the collection of Unwanted Medicine from Residents.

**Technician-Assisted Collection Kiosk Drop-Off Site** is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine, where Service Technicians will assist in removing, sealing, and packaging boxes and inner liners.

**Technician-Assisted Collection Kiosk Drop-Off Site Host** is the designated contact person or persons at the Technician-Assisted Collection Kiosk Drop-Off Site.

**Unwanted Medicine** is defined in Section IV of this Plan.

**Vendor** is any vendor retained by MED-Project to carry out its obligations under the Program.

## IV. Unwanted Medicine

For the purposes of the Plan, “Unwanted Medicine” includes all materials identified as “Covered Drugs” under Ordinance § 6.53.030(3) that qualify as “Unwanted Products” under Ordinance § 6.53.030(21). According to the Ordinance, Covered Drugs means “a Drug sold, offered for sale, or dispensed in Alameda County in any form including prescription and nonprescription drugs, drugs in medical devices and combination products, brand name and generic drugs, and drugs for veterinary use.” Unwanted Medicine does not include the following:

- i. Expired and/or undispensed samples direct from physicians’ offices;
- ii. Unused or expired drugs from hospitals and institutions;
- iii. Bulk animal pharmaceuticals from farms (business use);
- iv. Vitamins or supplements;
- v. Herbal-based remedies and homeopathic drugs, products, or remedies;
- vi. Compressed cylinders and mercury containing thermometers;
- vii. Cosmetics, shampoos, sunscreens, toothpaste, lip balm, antiperspirants, or other personal care products that are regulated as both cosmetics and nonprescription drugs under the federal Food, Drug, and Cosmetic Act (Title 21 U.S.C. Chapter 9);
- viii. Hard surface and toilet disinfectant cleaners;
- ix. Drugs administered in a healthcare setting;
- x. Drugs for which Producers provide a pharmaceutical product stewardship or take-back program as part of a FDA managed risk evaluation and mitigation strategy (Title 21 U.S.C. Sec. 355-1);
- xi. Drugs that are biological products, as defined by 21 C.F.R. 600.3(h) as it existed on February 2, 2016, if the Producer already provides a pharmaceutical product stewardship or take-back program;
- xii. Medical devices or their component parts or accessories;
- xiii. Used, empty containers, vials, and pouches;
- xiv. Sharps (*e.g.*, needles, auto-injectors); and
- xv. Schedule I or other illicit drugs.

See Section XII.A for collection limitations imposed by the DEA Rule.

## V. Collection of Unwanted Medicine

The Plan provides services to collect Unwanted Medicine, including controlled substances. The Program will accept Unwanted Medicine regardless of who produced it, unless excused from this requirement by the Department. The collection methods and any applicable legal requirements are described below.

### A. Unwanted Medicine Collection Program

#### 1. Outreach

MED-Project continues to periodically perform outreach to potential collection sites through calls, emails, and/or site visits with the goal of establishing Kiosk Drop-Off Sites distributed throughout the County.

LEAs and Pharmacies that currently host kiosks in the County may transition into the Program upon entering into an agreement with MED-Project.



## **2. Implementation**

MED-Project continues to implement the Program through executed agreements with Kiosk Drop-Off Site Hosts. Take-Back Events will also be conducted in coordination with scheduled Alameda County Department of Environmental Health Household Hazardous Waste (“HHW”)<sup>2</sup> events throughout the County.

Collection of Unwanted Medicine begins at Kiosk Drop-Off Sites once agreements have been executed with each location, kiosks have been installed, sites have been trained, and, in the case of pharmacies, all requirements of the DEA and Board of Pharmacy have been met.

## **3. Convenience**

Mail-Back Services will be available upon request by disabled and home-bound Residents or persons providing services to such Residents via the Call Center and MED-Project Website, thereby offering more opportunities to dispose of Unwanted Medicine. Mail-Back Services will also be available to Residents in underserved areas of the County until MED-Project has met its long-term kiosk installation goals established in Section VI.

## **4. Services**

MED-Project will routinely assess performance, gauge feedback, and revise its approach to services and convenience as appropriate. As implementation proceeds, MED-Project shall continue to approach organizations that may be available as future Kiosk Drop-Off Sites on a periodic basis, such as those listed in Appendix B.

The Program will be implemented in a flexible manner, offering coverage to Residents through a combination of Kiosk Drop-Off Sites, Mail-Back Services, and Take-Back Events. Over the course of implementation, additional Kiosk Drop-Off Sites will be established to the extent that (1) additional eligible LEAs and/or DEA-registered collector pharmacies agree to participate, and (2) contracts can be executed with such entities. For every engagement with LEAs and pharmacies, including the establishment of Kiosk Drop-Off Sites and/or the conducting of Take-Back Events, contracts outlining the responsibilities of all involved parties will be drafted, reviewed by appropriate entities, and signed by all parties before MED-Project installs kiosks and/or schedules Take-Back Events.

For more information regarding Take-Back Event scheduling, coverage, and frequency, *see* Section V.C.

Mail-Back Services will be available to disabled and home-bound Residents or to persons providing services to such Residents and/or Residents in underserved areas of the County upon request and will be reviewed routinely for availability and effectiveness. *See* Section V.E for more information about the availability of Mail-Back Services.

### **B. Kiosk Drop-Off Sites**

Kiosk Drop-Off Sites will continue to be strategically placed across the County in order to best serve Residents. All Kiosk Drop-Off Site Hosts shall provide Residents with access to Program kiosks during regular business hours.

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<sup>2</sup> <http://stopwaste.org/recycling/residents/household-hazardous-waste/one-day-event>

## **1. Kiosk Drop-Off Site Locations**

Kiosk Drop-Off Sites that are currently interested in and participating in the Program are identified in [Appendix C](#).

MED-Project will continue outreach to potential Kiosk Drop-Off Site Hosts that are not interested in or participating in the Program, such as sites listed in [Appendix D](#).

As required under Ordinance § 6.53.070(E), the Plan will include as a Kiosk Drop-Off Site any eligible site willing to serve voluntarily as a Kiosk Drop-Off Site for Unwanted Medicine and able to meet all applicable laws, regulations, and other legal requirements. Locations currently serving as a drop-off site may participate in the MED-Project Program by signing agreements with MED-Project and modifying their DEA registrations, if required. MED-Project will work with the Kiosk Drop-Off Site Host to transition to the Program and Vendor.

## **2. Drop-Off Site Kiosk Placement and Maintenance Program**

Kiosk installation shall be the responsibility of MED-Project at LEAs and pharmacy Kiosk Drop-Off Sites when the Kiosk Drop-Off Site Host has identified a compliant placement location. All kiosks in the Program must be securely placed and maintained inside a collector's registered location or LEA's physical location in accordance with DEA Rule §§ 1317.75(d)(1) and 1317.35(a). At pharmacies, kiosks will be placed in the immediate proximity of a designated area where controlled substances are stored and at which an employee is present (*i.e.*, can be seen from the counter), pursuant to DEA Rule § 1317.75(d)(2). Kiosk placement will also comply with any applicable Board of Pharmacy requirements. Costs associated with installation and maintenance will be paid by MED-Project per the contracts with the Kiosk Drop-Off Site Hosts.

The maintenance program will address items such as:

- Periodic inspection of kiosks to monitor general wear and tear;
- Service Technician access to the kiosks at Technician-Assisted Collection Kiosk Drop-Off Sites during the regularly scheduled pick-ups and notification of a Maintenance Technician if necessary; and
- Reporting by the Kiosk Drop-Off Site Host of damage to a kiosk or requested maintenance service.

All Kiosk Drop-Off Site Hosts are able to notify MED-Project of the need for kiosk service or maintenance via the Help Desk.

## **3. Kiosk Specifications**

A kiosk will be offered to eligible host locations. Pursuant to DEA Rule § 1317.75, MED-Project kiosks at pharmacies will:

- Be securely fastened to a permanent structure;
- Be securely locked, substantially constructed containers with a permanent outer container and removable inner liner;
- Include a small opening in the outer container that allows contents to be added to the inner liner, but does not allow removal of the inner liner's contents;
- Prominently display a sign indicating that only Schedule II-V controlled and non-controlled substances are acceptable to be placed in the kiosk; and
- Have the small opening in the outer container locked or made inaccessible to the public when a Kiosk Drop-Off Site employee is not present.

The design of the pharmacy kiosk and signage ([Appendix E](#)) satisfies these requirements through the use of heavy gauge steel; multiple locking mechanisms, including a locking mechanism on the drop-slot; a

tamper-proof slot; and commercial hinges. The design increases the likelihood of consumer participation by providing easy access to wheelchair users. The locking mechanism on the drop-slot prevents kiosk overflow once the container has reached its maximum level and is locked by the Kiosk Drop-Off Site employee. MED-Project pharmacy kiosks come with appropriate regulatory signage and instructions, including an instruction to remove personal information from any Unwanted Medicine and packaging before depositing them and language required under the DEA Rule<sup>3</sup> and by the Board of Pharmacy. Kiosk signage provides information about what is and is not accepted in the kiosk.

Additionally, under DEA Rule § 1317.60(a), MED-Project kiosk inner liners will:

- Be waterproof, tamper-evident, and tear-resistant;
- Be removable and sealable immediately upon removal without emptying or touching kiosk contents;
- When sealed, make the contents of the inner liner not viewable from the outside;
- Clearly indicate the size of the inner liner; and
- Bear a permanent, unique identifier for tracking purposes.

MED-Project kiosks and inner liners will also comply with Board of Pharmacy requirements.

While the DEA Rule does not require LEA kiosks to meet these same requirements, MED-Project will offer these kiosks and inner liners to LEAs. *See Disposal of Controlled Substances*, 79 Fed. Reg. 53,520, 53,531 (Sept. 9, 2014).

#### **4. Kiosk Collection**

Under DEA Rule § 1317.05(c)(2)(iv), pharmacy Kiosk Drop-Off Site Hosts must dispose of sealed inner liners and their contents either on-site, through common or contract carrier delivery to, or pick-up by a reverse distributor or distributor, or with DEA assistance.

DEA Rule § 1317.75(c) prohibits the counting, sorting, inventorying, or individual handling of any substances deposited into a pharmacy kiosk. Additionally, DEA Rule § 1317.60 limits inner liner access to employees of the collector and requires two employees to immediately seal the inner liner upon its removal from the pharmacy kiosk's permanent outer container. *See* DEA Rule § 1317.60(b), (c). DEA Rule § 1317.75(g) provides that pharmacy kiosk inner liner installation or removal shall be performed "by or under the supervision of at least two employees of the authorized collector." The pharmacy kiosk sealed inner liner must not be opened, x-rayed, analyzed, or otherwise penetrated. *See* DEA Rule § 1317.60(c).

At LEA Kiosk Drop-Off Sites, Vendor and/or LEA will maintain any records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEAs' recordkeeping requirements for illicit controlled substances evidence pursuant to DEA Rule § 1317.35. LEAs will record the unique identifier and size of the sealed inner liner transferred to Vendor. *See* DEA Rule § 1317.35. Additionally, any Unwanted Medicine will be stored in a manner to prevent the diversion of controlled substances and consistent with the LEA's standard procedures for storing illicit controlled substances. Collected Unwanted Medicine will be transferred to the disposal facility in a manner to prevent the diversion of Unwanted Medicine and consistent with the LEA's standard procedures for transferring illicit controlled substances. *See* DEA Rule § 1317.35.

MED-Project's Kiosk Drop-Off Site collection system complies with these DEA requirements for pharmacy and LEA Kiosk Drop-Off Sites. Vendor, pharmacies, and LEAs participating in the Program will keep all records required under the DEA Rule, including those required under DEA Rule §§ 1304 and 1317.35. Pharmacies participating in the Program will also keep all records required under Board of Pharmacy

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<sup>3</sup> Specifically, as required under DEA Rule § 1317.75(e)(4), all kiosks will prominently display a sign stating that: "Only Schedule II-V controlled and non-controlled substances that are lawfully possessed by the ultimate user are acceptable to be placed in the kiosk. Schedule I controlled substances, illicit or dangerous substances, and any controlled substances not lawfully possessed by the ultimate user may not be placed in the kiosk."

requirements. Pharmacy Kiosk Drop-Off Sites and Vendor will be instructed never to count, sort, inventory, or individually handle kiosk contents. MED-Project's Kiosk Drop-Off Site collection system will also comply with all applicable Board of Pharmacy requirements.

A Kiosk Drop-Off Site may elect to participate in the program via either the technician-assisted collection method or host-assisted collection method. If a Kiosk Drop-Off Site elects to participate via the technician-assisted collection method, a Service Technician will regularly come to the Technician-Assisted Collection Kiosk Drop-Off Site to help prepare the inner liner for shipment and disposal. If a Kiosk Drop-Off Site elects to participate via the host-assisted collection method, the Host-Assisted Collection Kiosk Drop-Off Site employees will prepare the inner liner for shipment.

#### **a. Technician-Assisted Collection**

For Kiosk Drop-Off Sites that opt to participate via the technician-assisted collection method, pick-up of Unwanted Medicine collected at the sites will be scheduled year-round, based on their regular business hours and volume collected. After arriving at a Technician-Assisted Collection Kiosk Drop-Off Site, the Service Technician will check the kiosk for any damage.

The inner liner and box will be securely removed from the kiosk by a Service Technician and Technician-Assisted Collection Kiosk Drop-Off Site employees following procedures meeting all DEA requirements. Specifically, two Technician-Assisted Collection Kiosk Drop-Off Site employees will hold the two keys to unlock the kiosk. Once the kiosk is unlocked, the inner liner will be removed from the kiosk and immediately sealed. The inner liner provided in the kiosk will be opaque to prevent visual recognition of the contents. The sealed inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.

Under the supervision of two Technician-Assisted Collection Kiosk Drop-Off Site employees, the Service Technician will prepare the liner for packaging and transport. The unique identifier of the inner liner will be matched to the tracking number on the shipping label. The Service Technician will schedule a pickup from the Carrier to be completed within two business days and leave the packaged, sealed inner liner with the Technician-Assisted Collection Kiosk Drop-Off Site Host for storage in compliance with all applicable laws, regulations, and other legal requirements until Carrier pickup. Vendor will prepare the materials for shipment and perform applicable pre-transportation functions to comply with DOT Hazardous Materials Regulations.

Any collection of controlled substances by LEA will be consistent with the LEA's standard procedures for transferring illicit controlled substances. *See* DEA Rule § 1317.35.

#### **b. Host-Assisted Collection**

Host-assisted collection will enable a site to directly control the timing for servicing the kiosk by allowing the site employees to prepare the liner for packaging and transport at a time of their choosing. This method will allow sites to avoid disruptions to operations that may result from Vendor-scheduled visits or storage limitations. MED-Project will provide Host-Assisted Collection Kiosk Drop-Off Site Hosts with information related to servicing kiosks and applicable laws, regulations, and other legal requirements when installing the kiosks and upon request through the Help Desk.

Unwanted Medicine will be securely removed from the kiosk by Host-Assisted Collection Kiosk Drop-Off Site employees following procedures meeting all DEA requirements. Specifically, two Host-Assisted Collection Kiosk Drop-Off Site employees will hold the two keys to unlock the kiosk. Once the kiosk is unlocked, the inner liner will be removed from the kiosk and immediately sealed. The inner liner provided in the kiosk will be opaque to prevent visual recognition of the contents. The sealed inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.

Following instructions provided by Vendor, the two Host-Assisted Collection Kiosk Drop-Off Site employees will seal the inner liner for packaging and transport. The unique identifier of the inner liner will

be matched to the tracking number on the shipping label. The two Host-Assisted Collection Kiosk Drop-Off Site employees will either schedule a pickup from the Carrier to be completed within two business days or offer the packaging containing the sealed inner liner for pickup a routine Carrier service to the Host-Assisted Collection Kiosk Drop-Off Site. If the package containing the sealed inner liner is prepared prior to pick-up, the Host-Assisted Collection Kiosk Drop-Off Site Host will store the inner liner in compliance with all applicable laws, regulations, and other legal requirements until Carrier pickup.

Following instructions provided by Vendor, the two Host-Assisted Collection Kiosk Drop-Off Site employees will prepare the materials for shipment and perform applicable pre-transportation functions to comply with DOT Hazardous Materials Regulations.

Following instructions provided by Vendor, the two Host-Assisted Collection Kiosk Drop-Off Site employees will replace the removed inner liner and box with a replenishment inner liner and box, provided by Vendor. Each inner liner and box provided by Vendor will be pre-paid and pre-addressed for transport and disposal.

Any collection of controlled substances by LEA will be consistent with the LEA's standard procedures for transferring illicit controlled substances. *See* DEA Rule § 1317.35.

## **5. Frequency of Pick-Up**

Initially, all Technician-Assisted Collection Kiosk Drop-Off Sites will be scheduled for a monthly pick-up from the kiosk. The Vendor will communicate with MED-Project in the event that the frequency of pick-up needs to be changed based on the volumes collected over time. As needed, MED-Project will communicate with the Technician-Assisted Collection Kiosk Drop-Off Site Host in the event the frequency of pick-up needs to be changed. Vendor will monitor the volumes per service to ensure that all sites are receiving the appropriate service frequency. Vendor will manage pick-up services as frequently as necessary to prevent overflow of the kiosk without providing unnecessary interruption to the participating Technician-Assisted Collection Kiosk Drop-Off Site. Host-Assisted Collection Kiosk Drop-Off Sites will be instructed to service the kiosk and request a pick-up by Carrier, as needed. Vendor will monitor the weight of Unwanted Medicine generated at each participating Kiosk Drop-Off Site.

## **6. Procedures if a Kiosk is Full Prior to Scheduled Pick-Up**

The Technician-Assisted Collection Kiosk Drop-Off Site Host shall be instructed to lock the drop-slot of the kiosk and notify MED-Project of the need for service if prior to the scheduled date.

Vendor shall provide a network of trained Service Technicians. Vendor will communicate service requests to field managers responsible for Service Technicians. Vendor will direct service to the trained Service Technician who is in closest proximity to the Technician-Assisted Collection Kiosk Drop-Off Site requesting the service. This process provides for a timely response to Technician-Assisted Collection Kiosk Drop-Off Sites requiring service prior to the scheduled date.

Service timelines will be assessed based on the specific characteristics of the Technician-Assisted Collection Kiosk Drop-Off Site's need. If necessary, Vendor will be able to respond within hours of the request. If the request does not require an urgent response, Vendor will respond within two business days of the request. In the interim, pharmacy Technician-Assisted Collection Kiosk Drop-Off Site Hosts shall be instructed to secure the kiosk and its contents in accordance with DEA requirements.

Host-Assisted Collection Kiosk Drop-Off Sites will be instructed to service the kiosk and request a pick-up by Carrier, as needed.

## **7. Unplanned Event Preparedness**

Vendor maintains a network of emergency responders that can be called on in the case of an emergency or spill incident. Vendor ensures compliance of all service providers through a business confidential qualification process. This process reviews the compliance history, management structure, financial stability, and other key indicators of a reliable emergency response service provider. Emergency responders will bring all necessary equipment in order to manage the specific needs of the Kiosk Drop-Off Site requiring emergency response. Kiosk Drop-Off Site Hosts will be directed to call 911 in situations posing an immediate threat to health or the environment.

A major event, such as a flood, earthquake or fire, may require response by a service team. This event can jeopardize the security characteristics of the kiosk as well as the structural integrity of the participating location. The team will assess the safety of the area along with the locations to be serviced. Once it is determined the area is safe for access, the team will work to secure the kiosk and remove its contents.

Along with major event preparedness, Vendor provides timely responses to events that may cause an inconvenience to the Kiosk Drop-Off Site Host. An example of this kind of event would be if the kiosk is giving off an odor prior to the scheduled service date. The Kiosk Drop-Off Site Host will contact MED-Project via the Help Desk. Vendor is able to respond within two to three hours in most cases when notified of a need for emergency response. If the request is not an emergency that requires an immediate response, Vendor will typically respond to a service location within two to three business days of the event.

An event may occur, such as a site requiring an emergency response or an LEA that is unwilling or unable to securely store inner liners prepared for shipment, that necessitates a direct transport of a sealed inner liner from a Kiosk Drop-Off Site to a disposal facility listed in Section X. In such cases, a Service Technician will seal the kiosk inner liner for packaging and transport according to the process outlined in Section V.B.4.a. The packaged inner liner will then be transported to one of the disposal facilities listed in Section X.

In addition, any items that a Resident deposits into the kiosk will not be retrieved.

### **C. Take-Back Events**

MED-Project will conduct Take-Back Events in coordination with HHW events throughout the County. MED-Project may also conduct Take-Back Events upon request by LEAs. LEA employees shall oversee all Take-Back Events. MED-Project will confirm and/or finalize the locations and dates to conduct Take-Back Events once contracts with overseeing LEAs have been executed.

Due to the changing schedule of Take-Back Events, the list of dates and locations will be maintained on the MED-Project Website as events are scheduled and confirmed.

#### **1. Method**

The conducting of Take-Back Events by MED-Project is contingent upon participation and oversight by LEAs. MED-Project will work with participating LEAs to ensure Take-Back Events are compliant and successful. Events will be promoted and communicated to the public through local communication channels as outlined in [Appendix F](#).

MED-Project Take-Back Events will meet all applicable laws, regulations, and other legal requirements. MED-Project will contract with LEAs to oversee Take-Back Events. MED-Project will work with LEAs to accommodate any reasonable requirements.

## 2. Procedures

MED-Project will partner with LEAs to ensure that at least one law enforcement officer oversees collection at all Take-Back Events pursuant to DEA Rule § 1317.65(a), (b). The law enforcement officers will maintain control and custody of all Unwanted Medicine collected at Take-Back Events from collection until secure transfer, storage, or destruction of the Unwanted Medicine, as required by DEA Rule § 1317.65(b). Only ultimate users and persons authorized to dispose of an ultimate user decedent's property in lawful possession of controlled substances in Schedules II-V may transfer these substances to the LEA during the event. No other person will handle controlled substances at Take-Back Events under DEA Rule § 1317.65(e); however, Vendor may assist LEAs in the collection of Unwanted Medicine at Take-Back Events. *See Disposal of Controlled Substances*, 79 Fed. Reg. 53,520, 53,539 (Sept. 9, 2014).

Take-Back Events will typically be staffed by at least two Vendor employees. Vendor will work in coordination with MED-Project, the County, and LEAs to monitor and ensure collection of all material at Take-Back Events is compliant with all applicable laws, regulations, and other legal requirements and meets the published expectations of the planned event. Vendor will work in conjunction with law enforcement to ensure all material is placed in a compliant collection receptacle and securely shipped to meet all applicable laws, regulations, and other legal requirements. Any material that is not Unwanted Medicine or does not meet legal requirements will be rejected.

Vendor and the LEA will maintain all records of collection, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence pursuant to DEA Rule § 1317.35. Any collected Unwanted Medicine will be stored to prevent the diversion of controlled substances and consistent with the LEA's standard procedures for storing illicit controlled substances. Any storage of Unwanted Medicine by Vendor will also comply with the applicable security requirements of DEA Rule §§ 1301 and 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances.

Following the completion of each event, containers will be weighed, securely packaged, labeled, transported from the event site to the LEA site, and shipped in compliance with all applicable laws, regulations, and other legal requirements. Law enforcement officers will maintain control and custody of all Unwanted Medicine collected at Take-Back Events while it is transported to the point of secure transfer, storage or destruction. Containers and inner liners will be tracked via unique identifiers to a facility identified in Section X, where they shall be incinerated. Vendor will ship the containers (and inner liners) in accordance with the requirements outlined in Section XII.B.

### **D. Disposal of Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events**

Vendor and Carrier shall manage the Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events in compliance with all applicable laws, regulations, and other legal requirements. Carrier and/or Vendor shall deliver Unwanted Medicine collected from Kiosk Drop-Off Sites and/or Take-Back Events to the respective facilities identified in Section X.

All inner liners will be destroyed in accordance with all applicable laws, regulations, and other legal requirements at the disposal facilities identified in Section X. MED-Project's request for approval to dispose of Host-Assisted Collection Kiosk Drop-Off Site inner liners at a municipal waste incinerator is included in Appendix G.



## **E. Mail-Back Services for Unwanted Medicine**

MED-Project will provide two types of Mail-Back Services:

- Standard Mail-Back Services for disabled and home-bound Residents or persons providing services to such Residents and to supplement kiosks until the convenience standard is met, as described in Section V.E.1;
- Inhaler Mail-Back Services for the collection of inhalers for disabled and home-bound Residents or persons providing services to such Residents as described in Section V.E.2.

Mail-Back Packages will be pre-paid and pre-addressed, and Mail-Back Services shall comply with all applicable laws, regulations, and other legal requirements.

### **1. Standard Mail-Back Services for Unwanted Medicine**

MED-Project will provide Standard Mail-Back Services at no cost to disabled and home-bound Residents or to persons providing services to such Residents. Standard Mail-Back Packages will also be available to Residents in underserved areas of the County until MED-Project has met its long-term kiosk installation goals. The pre-paid shipping label will direct the Standard Mail-Back Package to the facility identified in Section X. Standard Mail-Back Packages for Unwanted Medicine shall comply with all applicable laws, regulations, and other legal requirements.

Pursuant to DEA Rule § 1317.70(c), the Standard Mail-Back Packages will be:

- Nondescript and without any markings or information potentially indicating that they contain Unwanted Medicine, including controlled substances;
- Water and spill-proof, tamper-evident, tear-resistant, and sealable;
- Pre-addressed with and delivered to Vendor's registered address;
- Pre-paid;
- Provided with a unique identifier enabling tracking; and
- Provided with instructions indicating the process for mailing back the packages, accepted substances, a notice about mailing restrictions, and a notice that only packages provided by Vendor will be accepted for destruction.

Ultimate users and persons lawfully entitled to dispose of an ultimate user decedent's property will not be required to provide any personally identifiable information when using Standard Mail-Back Services to dispose of Unwanted Medicine. *See* DEA Rule § 1317.70(d). As required under DEA Rule § 1317.70(e), Vendor will only accept Standard Mail-Back Packages it made available (or packages lawfully forwarded under DEA requirements). Within three business days of receipt, Vendor will notify the DEA if it receives Standard Mail-Back Packages likely containing controlled substances that Vendor did not make available or did not agree to receive pursuant to DEA requirements. In accordance with DEA Rule § 1317.70(f), when Standard Mail-Back Packages are received, only employees of Vendor will handle the Standard Mail-Back Packages. Standard Mail-Back Packages will not be opened, x-rayed, analyzed, or otherwise penetrated upon receipt by Vendor. *See* DEA Rule § 1317.70(f). Vendor will keep all records required under the DEA Rule, including those identified in DEA Rule § 1304.22(f).

*See* [Appendix H](#) for Standard Mail-Back Package image and package specifications.



## **2. Inhaler Mail-Back Services for Inhalers**

For inhalers, MED-Project will offer disabled and home-bound Residents or persons providing services to such Residents Inhaler Mail-Back Services via the Call Center and MED-Project Website. The pre-paid shipping label will direct the Inhaler Mail-Back Packages to an approved facility identified in Section X. An instruction sheet will be included with the Inhaler Mail-Back Package that describes how to properly dispose of inhalers, explains what materials may be placed in the Inhaler Mail-Back Package, and how to return the Inhaler Mail-Back Package.

See [Appendix H](#) for an Inhaler Mail-Back Package image and package specifications.

## **3. Mail-Back Package Availability**

Disabled and home-bound Residents or persons providing services to such Residents may request Standard Mail-Back Packages and/or Inhaler Mail-Back Packages by calling the Call Center or through a link on the MED-Project Website. Upon request, such Residents will be provided Mail-Back Packages. Standard Mail-Back Packages will also be available to Residents in underserved areas of the County until MED-Project has met its long-term kiosk installation goals. Once the long-term kiosk installation goals have been met, Standard Mail-Back Services will only be available to disabled and home-bound Residents or to persons providing services to such Residents.

Each Mail-Back Package will contain an insert with instructions for use and information about other options for disposing of Unwanted Medicine in the Specified Languages. See [Appendix H](#) for Mail-Back Package images.

## **4. Mail-Back Package Collection and Disposal**

Requests to receive Mail-Back Packages will be taken through the Call Center and the MED-Project Website. Residents will be directed to follow the instructions provided in the Mail-Back Package and to place their Unwanted Medicine in the pre-addressed, pre-paid package. The Mail-Back Package shall be sent to an approved disposal facility in compliance with all applicable laws, regulations and other legal requirements. Each Mail-Back Package will have a unique identifier for tracking.

For Standard Mail-Back Packages, upon arriving at the disposal facility, the Mail-Back Packages will be scanned for receipt verification and incinerated at the disposal facilities listed in Section X. MED-Project's request for approval to dispose of Standard Mail-Back Packages at a municipal waste incinerator is included in [Appendix I](#). Any storage of filled Standard Mail-Back Packages by Vendor will comply with the applicable security requirements of DEA Rule § 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances. All Unwanted Medicine in Standard Mail-Back Packages will be destroyed promptly.

This Plan proposes to dispose of Inhaler Mail-Back Packages at a municipal waste combustor and/or a medical waste incinerator. See the facilities identified in Section X. MED-Project's request for approval to use a municipal waste combustor to dispose of inhalers collected through Inhaler Mail-Back Packages is included in [Appendix J](#).

## VI. Plan and Collection Goals

The short- and long-term goals of the Plan are described generally as follows. Additional detail on implementation is provided in Section V.A.2.

Goal Area	Short-Term	Long-Term
<b>Collection</b>	Within 90 days of Plan approval, implement Mail-Back Services for disabled and home-bound Residents, persons providing services to such Residents, and Residents in underserved areas of the County.	Continue to increase retail chain pharmacy participation through outreach, with a goal of achieving up to a total of 100 Kiosk Drop-Off Sites. Reduce collection via Take-Back Events and Mail-Back Services by establishing additional Kiosk Drop-Off Sites throughout the County.
<b>Education &amp; Public Outreach</b>	<p>Within 90 days of Plan approval, include Mail-Back Services for disabled and home-bound Residents, persons providing services to such Residents, and Residents in underserved areas of the County on the Call Center and MED-Project Website.</p> <p>Within 90 days of Plan approval, implement the Specified Languages on the Call Center and MED-Project Website.</p> <p>Within 90 days of Plan approval, release a Public Service Announcement (“PSA”) animation directed at Residents on social media websites, digital media, print, and broadcast (television). Within 90 days of approval release audio PSA via radio.</p> <p><i>See Section XI for more information about education and outreach programming.</i></p>	On an ongoing basis, MED-Project may revise and add communications materials based on changes to the Plan.
<b>Collector Outreach</b>	Periodic outreach to potential eligible Kiosk Drop-Off Sites via site visits, calls, and emails.	Ongoing communication with pharmacies and LEAs. Periodic evaluation and monitoring of participating Kiosk Drop-Off Sites.

MED-Project continues to implement Kiosk Drop-Off Sites in eligible locations that best serve the demographics and distribution of Residents. *See Section V.B* for more information about Kiosk Drop-Off Site collection.

In addition, MED-Project will conduct Take-Back Events throughout the year, in coordination with HHW events.

MED-Project Mail-Back Packages will be made available to disabled and home-bound Residents, persons providing services to such Residents, and Residents in underserved areas of the County by request through the Call Center and MED-Project Website.

## VII. Patient Privacy

Instructions at each Kiosk Drop-Off Site will inform people who deposit Unwanted Medicine that they should completely cross out, remove, or otherwise make unreadable any and all personally identifiable information on the drug containers and packaging before depositing them in the kiosk. In cases where people follow the instructions, there will be no readable personally identifiable information.

In addition to kiosk signage, MED-Project instructions, promotional, and educational materials encourage Residents to protect their information by ensuring that personally identifiable information is unreadable when utilizing Mail-Back Services or depositing Unwanted Medicine into kiosks.

Materials to help Residents cross out any personally identifiable information will also be available at Take-Back Events. This will ensure any patient information on drug packaging will be unreadable.

Vendor has additional protections available for keeping personally identifiable information safe and secure. Service Technicians are trained in managing items containing sensitive patient information. Privacy training is part of a Service Technician's prerequisite for field services. As added protection, Mail-Back Packages used for Mail-Back Services will be opaque rather than clear. In addition, inner liners used at Kiosk Drop-Off Sites and Take-Back Events will be opaque rather than clear, in compliance with the DEA Rule. This will prevent anyone, including the Service Technician, from seeing any information on the Unwanted Medicine placed in the kiosks.

Any patient information on collected drug packaging will be promptly destroyed with the Unwanted Medicine.

## VIII. Call Center

MED-Project will operate a Call Center for Residents in the Specified Languages. Questions from Residents will be managed through the Call Center with the support of an agent. All agents are trained to respond based on the requirements set by MED-Project.

The agents will answer general questions, including questions on the following topics:

1. Items that can be disposed of;
2. Disposal options; and
3. Direction to the MED-Project Website for additional information.

Because the list of Kiosk Drop-Off Sites and Take-Back Events is subject to change, Residents will be directed to the MED-Project Website or to an agent for detailed information about locations and contact information.

## IX. Training

Operational procedures, including training, are the responsibility of the Kiosk Drop-Off Site Host. MED-Project will support training if agreed to with the Kiosk Drop-Off Site Host. Additionally, MED-Project will manage a help desk to answer questions and monitor comments for participating Kiosk Drop-Off Sites.

The help desk will support two general communication functions:

1. Answer questions and monitor comments from participating Kiosk Drop-Off Site Hosts; and
2. Support and direct service requests from participating Kiosk Drop-Off Sites.

Vendor will comply with all applicable laws, regulations, and other legal requirements. Vendor's internal training process will address the following:

- Onboarding & on-truck observation of job functions;
- DOT Training;
- DEA Training;
- United States Environmental Protection Agency ("EPA") Waste Characterization;
- Occupational Safety and Health Administration ("OSHA") Training;
- Waste Handling Demo;
- Truck Operation;
- DEA Handling Demo;
- Health Insurance Portability and Accountability Act ("HIPAA") requirements;
- OSHA Bloodborne Pathogens Standard;
- Review & Written Test; and
- Perform work under supervision to demonstrate proficiency prior to certification to service client accounts.

#### **A. Service Technician Training**

The Service Technicians collecting and packaging the Unwanted Medicine for transport from Technician-Assisted Collection Kiosk Drop-Off Sites will complete comprehensive training. This training includes instruction on:

- DOT hazardous materials requirements;
- EPA waste characterization requirements;
- Resource Conservation and Recovery Act ("RCRA") hazardous waste requirements;
- DEA controlled substances transfer protocols;
- OSHA requirements; and
- HIPAA requirements.

Service Technicians must complete a 24 or 40-hour Hazardous Waste Operations and Emergency Response Standard course. Additionally, Service Technicians must complete annual refresher training. Finally, Service Technicians receive ongoing training through meetings and online refresher courses. All Vendor employees servicing Technician-Assisted Collection Kiosk Drop-Off Sites, Mail-Back Services, and/or Take-Back Events will have a training base similar to that of Service Technicians, with customized training as needed.

## X. Vendor, Transporter, and Disposal Facility Information

All Vendors, transporters, and disposal facilities utilized by the Program will operate in accordance with all applicable laws, regulations, and other legal requirements.<sup>4</sup>

### Technician-Assisted Collection Kiosk Drop-Off Site and Take-Back Event Collection Services

#### A. Vendor for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

- Name: **Stericycle Specialty Waste Solutions, Inc.** (“Stericycle”) will service Technician-Assisted Collection Kiosk Drop-Off Sites. Stericycle may also service Take-Back Events.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

#### B. Carrier for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

- Name: **United Parcel Service, Inc.** may transport Unwanted Medicine from Technician-Assisted Collection Kiosk Drop-Off Sites to the Stericycle, Inc., Indianapolis, Indiana Facility or the Stericycle, Inc., Warren, Ohio Facility. United Parcel Service, Inc. may also transport Unwanted Medicine from Take-Back Events to the Stericycle, Inc., Indianapolis, Indiana Facility or the Stericycle, Inc., Warren, Ohio Facility.
- Address: 55 Glenlake Parkway NE, Atlanta, GA 30328
- Phone: (800) PICK-UPS
- Website: [www.UPS.com/](http://www.UPS.com/)
- Type: Common Carrier
- U.S. Small Package DOT No: 21800, Status: Issued
- U.S. Freight DOT No: 121058, Status: Issued
- Penalty Record (5 years): For enforcement history, UPS advises that “all material government investigation and enforcement activity is provided in our SEC filings at [investors.ups.com](http://investors.ups.com)”

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<sup>4</sup> Two witnesses of the registrant will witness destruction at the disposal facilities.

## C. Reverse Distributor Facility & Transporters for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

### 1. Reverse Distributor Facility

- Name: **Stericycle, Inc., Indianapolis, Indiana Facility** will receive Unwanted Medicine from United Parcel Service, Inc.
- Address: 2670 Executive Drive, Suite A, Indianapolis, IN 46241-9901
- Phone: (317) 275-7530
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- Type: DEA Registered Collector and Reverse Distributor & Permitted Hazardous Waste (RCRA) Treatment, Storage, and/or Disposal Facility
- DEA Registration No: RS0331607, Status: Issued
- EPA ID No: INR000110197, Status: Issued
- TSDF (RCRA) Permit No: INR000110197, Status: Issued
- Solid Waste Processing Facility Permit No: FP 49-57, Status: Issued
- Air Quality Permit No: E097-28740-00671, Status: Issued
- Penalty Record (5 years): *See Appendix K*

### 2. Transporter 1

- Name: **Heritage Transport** may transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Heritage Thermal Services-Ohio.
- Address: 1626 Research Way, Indianapolis, IN 46231
- Phone: (317) 486-2973
- Website: <http://www.heritage-enviro.com/>
- Type: Hazardous Waste Transporter
- EPA ID No: IND 058 484 114, Status: Issued
- US DOT No: 314460, Status: Issued
- Penalty Record (5 years): None

### 3. Transporter 2

- Name: **Veolia – Port Arthur** may be used to transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Veolia – Port Arthur.
- Address: 7665 Texas Highway 73, Beaumont, TX 77705
- Phone: (409) 736-2821
- Website: [www.veolianothamerica.com](http://www.veolianothamerica.com)
- Type: Hazardous Waste Transporter
- EPA ID No: TXD000838896, Status: Issued
- State Title V Permit No: O-01509, Status: Issued
- Air Permit No: NSR Air, Status: Issued
- Water Permit No: TPDES02417, Status: Issued
- TSDF (RCRA) Permit No: HW-50212, Status: Issued
- Penalty Record (5 years): *See Appendix K*

#### 4. Transporter 3

- Name: **Stericycle Specialty Waste Solutions, Inc.** may transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Heritage Thermal Services – Ohio, Veolia-Port Arthur, the Stericycle, Inc., Warren, Ohio Facility, and/or Clean Harbors – Aragonite. Stericycle Specialty Waste Solutions, Inc. may also be used to transport Unwanted Medicine from Kiosk Drop-Off Sites and/or Take-Back Events to any of the disposal facilities listed in Section X.D or Section X.H.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- Type: Hazardous Waste Transporter
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

#### D. Disposal Facilities for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

##### 1. Disposal Facility 1

- Name: **Heritage Thermal Services – Ohio** may incinerate Unwanted Medicine received from the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 1250 Saint George Street, East Liverpool, OH 43920
- Phone: (800) 545-7655
- Website: <http://www.heritage-thermal.com/>
- Type: Permitted Hazardous Waste Incinerator
- DEA Registration No: RH0387628, Status: Issued
- RCRA Permit No: OHD980613541, Status: Issued
- EPA ID No: OHD 980 613 541, Status: Issued
- Ohio ID No: 02-15-0589, Status: Issued
- Penalty Record (5 years): *See Appendix K*

##### 2. Disposal Facility 2

- Name: **Veolia – Port Arthur** may incinerate Unwanted Medicine received from the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 7665 Texas Highway 73, Beaumont, TX 77705
- Phone: (409) 736-2821
- Website: [www.veolianorthamerica.com](http://www.veolianorthamerica.com)
- Type: Permitted Hazardous Waste Incinerator
- EPA ID No: TXD000838896, Status: Issued
- State Title V Permit No: O-01509, Status: Issued
- Air Permit No: NSR Air, Status: Issued
- Water Permit No: TPDES02417, Status: Issued
- TSDF (RCRA) Permit No: HW-50212, Status: Issued
- Penalty Record (5 years): *See Appendix K*

### 3. Disposal Facility 3

- Name: **Stericycle, Inc., Warren, Ohio Facility** may incinerate Unwanted Medicine received from the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: <https://www.stericycle.com/service-locations/ohio/warren>
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

### 4. Disposal Facility 4

- Name: **Clean Harbors - Aragonite** may incinerate Unwanted Medicine received from the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 3 Miles E 7 Miles N of Knolls, Wendover, UT 84083
- Phone: (435) 884-8900
- Website: [www.cleanharbors.com](http://www.cleanharbors.com)
- Type: Permitted Hazardous Waste Incinerator
- US EPA ID No: UTD981552177, Status: Issued
- TSDF (RCRA) Permit No: UTD981552177, Status: Issued
- State Title V Permit No: 4500048002, Status: Issued
- Air Permit No: DAQE-168-02, Status: Issued
- Penalty Record (5 years): *See Appendix K*

## Host-Assisted Collection Kiosk Drop-Off Sites

### E. Vendors for Host-Assisted Collection Kiosk Drop-Off Sites

#### 1. Vendor 1

- Name: **Covanta Environmental Solutions, LLC** may provide boxes and inner liners for Host-Assisted Collection Kiosk Drop-Off Sites.
- Address: 7326 E. Evans Road Suite B, Scottsdale, AZ 85620
- Phone: (855) 269-1750
- Website: [www.covantaes.com](http://www.covantaes.com)
- DEA Registration No: RC0518160, Status: Issued
- Penalty Record (5 years): None

#### 2. Vendor 2

- Name: **Stericycle Specialty Waste Solutions, Inc.** may provide boxes and inner liners for Host-Assisted Collection Kiosk Drop-Off Sites.
- Address: 2850 100th Court NE Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None



## F. Carrier for Host-Assisted Collection Kiosk Drop-Off Sites

- Name: **United Parcel Service, Inc.** may transport Unwanted Medicine from Host-Assisted Collection Kiosk Drop-Off Sites to the Covanta Environmental Solutions, LLC Scottsdale, Arizona Facility or the Covanta Manheim, Pennsylvania Facility. United Parcel Service, Inc. may also transport Unwanted Medicine from Host-Assisted Collection Kiosk Drop-Off Sites to the Stericycle, Inc., Indianapolis, Indiana Facility or the Stericycle, Inc., Warren, Ohio Facility.
- Address: 55 Glenlake Parkway NE, Atlanta, GA, 30328
- Phone: 800-PICK-UPS
- Website: [www.UPS.com/](http://www.UPS.com/)
- Type: Common Carrier
- U.S. Small Package DOT No: 21800, Status: Issued
- U.S. Freight DOT No: 121058, Status: Issued
- Penalty Record (5 years): For enforcement history, UPS advises that “all material government investigation and enforcement activity is provided in our SEC filings at [investors.ups.com](http://investors.ups.com)”

## G. Reverse Distributor Facility & Transporter for Host-Assisted Collection Kiosk Drop-Off Sites

### 1. Reverse Distributor Facility 1

- Name: **Covanta Environmental Solutions, LLC Scottsdale, Arizona Facility** may receive Unwanted Medicine from United Parcel Service, Inc.
- Address: 7326 E. Evans Road, Suite B, Scottsdale, AZ 85620
- Phone: (855) 269-1750
- Website: [www.covantaes.com](http://www.covantaes.com)
- Type: DEA Registered Collector and Reverse Distributor
- DEA Registration No: RC0518160, Status: Issued
- Special Permit No: DOT-SP 20255, Status: Issued
- Penalty Record (5 years): None

### 2. Reverse Distributor Facility 2

- Name: **Covanta Manheim, Pennsylvania Facility** may receive Unwanted Medicine from United Parcel Service, Inc.
- Address: 190 Shellyland Road, Manheim, PA 17545
- Phone: (717) 653-8882
- Website: [www.covantaes.com](http://www.covantaes.com)
- Type: DEA Registered Collector and Reverse Distributor
- DEA Registration No: RC0322595, Status: Issued
- Penalty Record (5 years): None

### 3. Reverse Distributor Facility 3

- Name: **Stericycle, Inc., Indianapolis, Indiana Facility** may receive Unwanted Medicine from United Parcel Service, Inc.
- Address: 2670 Executive Drive, Suite A, Indianapolis, IN 46241-9901
- Phone: (317) 275-7530
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- Type: DEA Registered Collector and Reverse Distributor & Permitted Hazardous Waste (RCRA) Treatment, Storage, and/or Disposal Facility
- DEA Registration No: RS0331607, Status: Issued
- EPA ID No: INR000110197, Status: Issued
- TSDF (RCRA) Permit No: INR000110197, Status: Issued
- Solid Waste Processing Facility Permit No: FP 49-57, Status: Issued
- Air Quality Permit No: E097-28740-00671, Status: Issued
- Penalty Record (5 years): *See Appendix K*

### 4. Transporter 1

- Name: **Transchem Environmental, LLC** may transport Unwanted Medicine from the Covanta Environmental Solutions, LLC Scottsdale, Arizona Facility to the Covanta Long Beach, California Facility Solid Waste Combustor.
- Address: 542 East 27th Street, Tucson, AZ 85713
- Phone: (602) 344-4536
- Website: [www.tcenv.com](http://www.tcenv.com)
- Type: Contract Carrier
- US EPA ID No: AZD982484578, Status: Issued
- US DOT No: 1341480, Status: Issued
- Penalty Record (5 years): None

### 5. Transporter 2

- Name: **Doncin Transport, Inc.** may transport Unwanted Medicine from the Covanta Manheim, Pennsylvania Facility to the Curtis Bay Energy, LP Medical Waste Incinerator.
- Address: 3478 Sunnyside Rd., Manheim, PA 17545
- Phone: (602) 344-4536
- Website: <http://www.truckdrivingcdljobs.com/in/Pennsylvania/Manheim/DONCIN%20TRANSPORT%20INC.php>
- Type: Contract Carrier
- US DOT Number: 001625457, Status: Issued
- Penalty Record (5 years): None

### 6. Transporter 3

- Name: **Stericycle Specialty Waste Solutions, Inc.** may transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to the Stericycle, Inc., Warren, Ohio Facility.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- Type: Hazardous Waste Transporter
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

## H. Disposal Facilities for Host-Assisted Collection Kiosk Drop-Off Sites

### 1. Disposal Facility 1

- Name: **Covanta Long Beach** will incinerate Unwanted Medicine received from Transchem Environmental, LLC.
- Address: 118 Pier S Ave, Long Beach, CA 90802
- Phone: (562) 436-0636
- Website: [www.covantaes.com](http://www.covantaes.com)
- Type: Municipal Solid Waste Combustor
- Solid Waste Permit: 19-AK-0083. County of Los Angeles Public Health, Status: Issued
- Title V Air Permit No: D47903. South Coast Air Quality Management District, Status: Issued
- US EPA ID No: CAD982520066, Status: Issued
- Penalty Record (5 years): None

### 2. Disposal Facility 2

- Name: **Curtis Bay Energy, LP** will incinerate Unwanted Medicine received from Doncin Transport, Inc.
- Address: 3200 Hawkins Point Road Baltimore, MD 21226
- Phone: (855) 228-1715
- Website: [www.curtisbayenergy.com](http://www.curtisbayenergy.com)
- Type: Permitted Medical Waste Incinerator
- Title V Air Permit No.: 24-510-02975, Status: Issued
- Maryland Department of the Environment Refuse Disposal Permit No.: 2017-WMI-0036, Status: Issued
- US EPA ID No.: MDD985404318, Status: Issued
- Penalty Record (5 years): *See Appendix K*

### 3. Disposal Facility 3

- Name: **Stericycle, Inc., Warren, Ohio Facility** may incinerate Unwanted Medicine received from Stericycle Specialty Waste Solutions, Inc or United Parcel Service, Inc.
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: <https://www.stericycle.com/service-locations/ohio/warren>
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

## Standard Mail-Back Services

### I. Vendors for Standard Mail-Back Packages

#### 1. Vendor 1

- Name: **Stericycle Specialty Waste Solutions, Inc.** may provide Standard Mail-Back Packages.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

#### 2. Vendor 2

- Name: **Covanta Environmental Solutions, LLC** may provide Standard Mail-Back Packages.
- Address: 7326 E. Evans Road, Suite B, Scottsdale, AZ 85620
- Phone: (855) 269-1750
- Website: [www.covantaes.com](http://www.covantaes.com)
- DEA Registration No: RC0518160, Status: Issued
- Penalty Record (5 years): None

### J. Carrier for Standard Mail-Back Packages

- Name: **United States Postal Service** may ship Standard Mail-Back Packages to the Stericycle, Inc., Warren, Ohio Facility. United States Postal Service may also ship Standard Mail-Back Packages to the Covanta Manheim, Pennsylvania Facility.
- Address: 475 L'Enfant Plaza, S.W. Washington, DC 20260
- Phone: (202) 268-2000
- Website: [www.USPS.com/](http://www.USPS.com/)
- Type: Common Carrier
- Penalty Record (5 years): For enforcement history, see [USPS SEC filings](#)

### K. Reverse Distributor Facilities and Transporter for Standard Mail-Back Packages

#### 1. Reverse Distributor Facility

- Name: **Covanta Manheim, Pennsylvania Facility** will receive Standard Mail-Back Packages from Covanta Environmental Solutions, LLC via United States Postal Service.
- Address: 190 Shellyland Road, Manheim, PA 17545
- Phone: (717) 653-8882
- Website: [www.covantaes.com](http://www.covantaes.com)
- Type: DEA Registered Collector and Reverse Distributor
- DEA Registration No: RC0322595, Status: Issued
- Penalty Record (5 years): None

## 2. Transporter

- Name: **Doncin Transport, Inc.** will transport Standard Mail-Back Packages from the Covanta Manheim, Pennsylvania Facility to Covanta Lancaster and/or Covanta York.
- Address: 3478 Sunnyside Rd., Manheim, PA 17545
- Phone: (602) 344-4536
- Website: <http://www.truckdrivingcdljobs.com/in/Pennsylvania/Manheim/DONCIN%20TRANSPORT%20INC.php>
- Type: Contract Carrier
- US DOT Number: 001625457, Status: Issued
- Penalty Record (5 years): None

## L. Disposal Facilities for Standard Mail-Back Packages

### 1. Disposal Facility 1

- Name: **Stericycle, Inc. Warren, Ohio** will incinerate Standard Mail-Back Packages received from United States Postal Service.
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: [www.stericycle.com/service-locations/ohio/warren](http://www.stericycle.com/service-locations/ohio/warren)
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

### 2. Disposal Facility 2

- Name: **Covanta Lancaster** will incinerate Standard Mail-Back Packages received from the Covanta Manheim, Pennsylvania Facility.
- Address: 1911 River Road, Bainbridge, PA 17502
- Phone: (717) 397-9968
- Website: [www.covanta.com](http://www.covanta.com)
- Type: Municipal Solid Waste Combustor
- Solid Waste Permit: 400592 PaDEP, Status: Issued
- Title V Operating Permit: 36-05013, Status: Issued
- US EPA ID No: CAD982520066, Status: Issued
- Penalty Record (5 years): None

### 3. Disposal Facility 3

- Name: **Covanta York** will incinerate Standard Mail-Back Packages received from the Covanta Manheim, Pennsylvania Facility.
- Address: 2651 Blackbridge Road, York, PA 17406
- Phone: (717) 843-2902
- Website: [www.covanta.com](http://www.covanta.com)
- Type: Municipal Solid Waste Combustor
- Solid Waste Permit: 400561 PaDEP, Status: Issued
- Title V Operating Permit: 67-05006, Status: Issued
- Penalty Record (5 years): None

## Inhaler Mail-Back Services

### M. Vendors for Inhaler Mail-Back Packages

#### 1. Vendor 1

- Name: **PureWay Compliance Inc.** may provide Inhaler Mail-Back Packages.
- Address: 20501 Katy Freeway, Suite 206, Katy, TX 77450
- Phone: (877) 765-3030
- Website: <http://pureway.com/>
- Penalty Record (5 years): None

#### 2. Vendor 2

- Name: **Stericycle Specialty Waste Solutions, Inc.** may provide Inhaler Mail-Back Packages.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

### N. Carriers for Inhaler Mail-Back Packages

#### 1. Carrier 1

- Name: **United Parcel Service, Inc.** will transport Inhaler Mail-Back Packages provided by PureWay Compliance Inc. to Daniels SharpSmart, Inc. Fresno, California Transfer Facility.
- Address: 55 Glenlake Parkway NE, Atlanta, GA 30328
- Phone: (800) PICK-UPS
- Website: [www.UPS.com/](http://www.UPS.com/)
- Type: Common Carrier
- U.S. Small Package DOT No: 21800, Status: Issued
- U.S. Freight DOT No: 121058, Status: Issued
- Penalty Record (5 years): For enforcement history, UPS advises that “all material government investigation and enforcement activity is provided in our SEC filings at [investors.ups.com](http://investors.ups.com)”

#### 2. Carrier 2

- Name: **United States Postal Service** will transport Inhaler Mail-Back Packages provided by Stericycle to the Stericycle, Inc. Warren, Ohio Facility.
- Address: 475 L'Enfant Plaza, S.W. Washington, DC 20260
- Phone: (202) 268-2000
- Website: [www.USPS.com/](http://www.USPS.com/)
- Type: Common Carrier
- Penalty Record (5 years): For enforcement history, see [USPS SEC filings](#)

## O. Transfer Facility for Inhaler Mail-Back Packages

- Name: **Daniels Sharpsmart, Inc. Fresno, California Transfer Facility** will receive Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and provide for transport to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 4144 East Therese Avenue, Fresno, CA 93725
- Phone: (559) 834-6252
- Website: <http://danielsinternational.com/>
- Type: Medical Waste Treatment Facility
- Medical Waste Permit No: TS-OST-55, Status: Issued
- CA EPA ID No: CAL000344393, Status: Issued
- US DOT No: 1295076, Status: Issued
- Penalty Record (5 years): *See Appendix K*

## P. Transporter(s) for Inhaler Mail-Back Packages

### 1. Transporter 1

- Name: **Lula Logistics Inc.** may transport Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from the Daniels Sharpsmart, Inc. Fresno, California Transfer Facility to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 8268 Nelson Ridge Ln, Las Vegas, NV 89178
- Phone: (352) 346-6219
- Email: <https://www.lulalogisticsinc.com/>
- Type: Contract Carrier
- US DOT No: 2335002, Status: Issued
- Penalty Record (5 years): None

### 2. Transporter 2

- Name: **GPB Logistics Inc.** may transport Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from the Daniels Sharpsmart, Inc. Fresno, California Transfer Facility to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 2115 W Farwell Ave #103, Chicago, IL 60645
- Phone: (773) 968-7210
- Website: [www.gpblogistics.com](http://www.gpblogistics.com)
- Type: Contract Carrier
- US DOT No: 2783871, Status: Issued
- Penalty Record (5 years): None

## Q. Disposal Facilities for Inhaler Mail-Back Packages

### 1. Disposal Facility 1

- Name: **Covanta Huntsville, Inc.** will incinerate Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from Daniels Sharpsmart, Inc. Fresno, California Transfer Facility.
- Address: 5251 Triana Blvd SW, Huntsville, AL 35805
- Phone: (256) 882-1019
- Website: <https://www.covanta.com/Our-Facilities/Covanta-Huntsville>
- Type: Municipal Waste Combustor
- Title V Air Permit No: 709-1104, Status: Issued
- US EPA ID No: AL0000266726, Status: Issued
- Penalty Record (5 years): None

## 2. Disposal Facility 2

- Name: **Covanta Marion, Inc.** will incinerate Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from Daniels Sharpshoot, Inc. Fresno, California Transfer Facility.
- Address: 4850 Brook Lake Rd. NE, Brooks, OR 97305
- Phone: (503) 393-0890
- Website: <https://www.covanta.com/Our-Facilities/Covanta-marion>
- Type: Municipal Waste Combustor
- Conditionally Exempt Small Quantity Generator: ORD987179470, Status: Issued
- Title V Air Permit No: 24-5398-TV-01, Status: Issued
- NPDES Permit No: 1200-Z, Status: Issued
- Solid Waste Permit No: 364, Status: Issued
- Penalty Record (5 years): None

## 3. Disposal Facility 3

- Name: **Stericycle, Inc. Warren, Ohio** will incinerate Inhaler Mail-Back Packages provided by Stericycle and received from the United States Postal Service.
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: [www.stericycle.com/service-locations/ohio/warren](http://www.stericycle.com/service-locations/ohio/warren)
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None



## **XI. Unwanted Medicine Educational and Outreach Programming**

### **A. Overview**

MED-Project will perform public education and outreach to educate Residents about the collection and disposal of Unwanted Medicine from households.

### **B. Audiences**

To effectively educate the public about the Program, MED-Project will continue to implement a comprehensive communications campaign featuring both broad communications tactics as well as targeted outreach to audiences directly involved in the distribution and use of medicines to Residents. These audiences may include:

- General public;
- Pharmacies, including education for dispensers of Unwanted Medicine;
- Retailers of Unwanted Medicine;
- Health care providers and their patients;
- Veterinary providers and animal owners;
- Public health facilities; and/or
- LEAs.

The Program will include efforts to reach the varied cultural, linguistic, geographic, and age demographics, including through outreach to ethnic, community, and alternate-language media; outreach to community organizations serving a broad range of audiences; availability of alternate language phone lines (Section XI.D.1); and availability of educational information through a broad range of media platforms.

Demographic information from the US Census Bureau, including race, ethnicity, language, age, and geographic data, will be analyzed in the survey (*see* Section XI.F) in order to appropriately direct outreach and create educational materials to best serve the unique needs of identified demographics.

### **C. Messages**

MED-Project anticipates that messaging will:

- Educate Residents about the appropriate use, storage, and disposal of Unwanted Medicine;
- Educate Residents about available Mail-Back Services; and
- Provide Residents with information about available locations and events in their area that offer disposal of Unwanted Medicine.

Key points of emphasis might include:

- The importance of taking medicines as prescribed by your health care provider;
- The importance of adhering to and completing your provider-prescribed therapy;
- The importance of properly and securely storing medicines;
- The importance of promptly and properly disposing of Unwanted Medicine;
- How to find and use Kiosk Drop-Off Sites;
- How to properly dispose of Unwanted Medicine; and
- Privacy issues (removing personally identifiable information from labeled prescription containers).

## D. Tools/Communications Channels

The MED-Project Program will include a number of components designed to reach consumers and provide consistent access to timely and relevant information. Distribution of materials will likely include audiences such as LEAs, retail pharmacies, health care providers and systems, health associations, local government agencies, and other community organizations.

MED-Project will evaluate media and public outreach against the goal of a combined target reach percent of 50% at a 2+ frequency for the duration of one month, at least three times per year for years 2 through 4 of the Program. MED-Project intends to meet this target with a combination of digital media campaigns, print ads, and traditional broadcast media. The quantity and frequency will be confirmed as activities are completed.

MED-Project expects that the tools and communication channels will include:

### 1. Phone

The Program will provide a toll-free telephone number for Residents to obtain information about Kiosk Drop-Off Sites, Take-Back Events, Mail-Back Services, educational materials, and other aspects of the Program for the take-back of Unwanted Medicine from households. The toll-free number will provide:

- Call Center in the Specified Languages. The telephone line will also provide an option for callers to be transferred to a staffed Call Center.
- Basic information about the Program, such as where to obtain more information (*e.g.*, the MED-Project Website) and an option to talk with an agent to find or utilize Kiosk Drop-Off Sites, Mail-Back Services, and/or Take-Back Events, if applicable, in the caller's zip code or local area.
- A recorded call script directing callers with medical emergencies to call 911 and directing callers with medication-related questions to contact their health care provider(s).

Please see [Appendix L](#) for the call script.

### 2. MED-Project Website

MED-Project will update the mobile-friendly MED-Project Website with translations in the Specified Languages. MED-Project expects information available to users will include pages to help Residents find locations of Kiosk Drop-Off Sites, Mail-Back Services, as well as educational materials, frequently asked questions and responses, and Take-Back Event dates and locations.

- The Plan currently includes a mockup of the types of information a MED-Project Website and its supporting pages might contain. [Appendix M](#) provides a proof of concept example for a possible MED-Project Website with subpages.
- The MED-Project Website may also include access to a public relations toolkit in a downloadable format (*see* Section XI.D.3) and contact information for Residents. A toolkit could include items such as a flyer/brochure (*See Appendix N* for an example) and a frequently asked questions (FAQ) document. Translations of the brochure and FAQ will be available in the Specified Languages.
- Community and government organizations and other public interest groups seeking materials to promote the Program will be encouraged to access these resources.

### 3. Materials

Educational materials about the Program and how to properly dispose of Unwanted Medicine will be available through the MED-Project Website, through potential third-party partners, community organizations, and at Kiosk Drop-Off Sites.

The Plan includes the information and educational brochure ([Appendix N](#)). Educational materials will use plain language and explanatory images to promote consumer education and collection options to Residents with limited English proficiency.

### 4. Social Media

MED-Project will continue the social media campaign consisting of Facebook and Twitter. These social media portals ([Appendix O](#)) are used to communicate the latest information to Residents. Outreach is based on the establishment of Kiosk Drop-Off Sites and the scheduling of Take-Back Events. Posts are scheduled on a weekly basis to reflect the most up-to-date information available.

### 5. Broadcast Outreach

Outreach through local print, online, radio, and television outlets, including through outlets specifically targeting the diverse demographic communities within the County, will continue upon Plan approval. Please *see* [Appendix F](#) for a media list of key outlets. Broadcast outreach will be scheduled on a quarterly basis to reflect real time implementation developments.

### E. Collaboration with County Officials and Community Organizations

MED-Project expects that the Program will work in collaboration with the County as appropriate to build on existing community outreach resources, such as local organizations, media lists, available public media outlets, etc. Activities like the following will continue upon Plan approval:

- *Briefing Materials Provided to Support Coordination with County Officials:*
  - The Program will provide access to updated educational and outreach materials, including the brochure (*see* [Appendix N](#)), to relevant departments and officials.
- *Outreach through Community Organizations:*
  - The Program will engage relevant stakeholders and community organizations by providing selected community organizations identified in [Appendix B](#) with the updated brochure included in [Appendix N](#).

### F. Effectiveness

MED-Project will conduct a biennial survey of Residents and pharmacists, veterinarians, and health professionals in the County who interact with patients to measure Program awareness and to evaluate the effectiveness of its education and outreach activities. The survey will be conducted in conjunction with the biennial survey conducted under MED-Project's stewardship program for the collection of sharps from households. The first survey will be conducted after the first full year of operation of MED-Project's program for sharps.

### G. Disclaimer

The written and verbal educational materials and public outreach tools that are required by the Ordinance and disseminated under this Product Stewardship Plan will include a disclaimer similar to the following: "This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan."

## **XII. Compliance with Applicable Laws, Regulations, and other Legal Requirements**

As described in more detail below, the Plan is designed such that all entities participating in the Program shall comply with all applicable laws, regulations, and other legal requirements.

### **A. DEA Controlled Substances Act and Implementing Regulations**

On October 12, 2010, the United States Congress enacted the Secure and Responsible Drug Disposal Act of 2010 (“Disposal Act”) as amendments to the Controlled Substances Act (“CSA”). The Disposal Act amended the CSA to allow for the expansion of entities to which users can deliver pharmaceutical controlled substances for disposal, subject to regulations to be promulgated. On September 9, 2014, the DEA adopted a rule entitled “Disposal of Controlled Substances” (referred to herein as the “DEA Rule”) to implement the Disposal Act.

Under the DEA Rule, collection of controlled substances is limited to Schedule II, III, IV, or V controlled substances that are lawfully possessed by an ultimate user or person entitled to dispose of an ultimate user decedent’s property. *See* DEA Rule §§ 1317.75(b) (Kiosk Drop-Off Sites)<sup>5</sup>; 1317.65(d) (Take-Back Events); 1317.70(b) (Mail-Back Services). Schedule I controlled substances, controlled substances that are not lawfully possessed as described above, and other illicit or dangerous substances will not be collected. Additionally, as these provisions of the DEA Rule limit collection of controlled substances to those lawfully possessed by an ultimate user or certain other persons, pharmacies are prohibited from disposing their own inventory or stock through the MED-Project Program. *See also* DEA Rule § 1317.05.

The DEA Rule provides that LEAs can continue to accept controlled substances for disposal. However, the DEA Rule also provides that pharmacies, reverse distributors, hospitals/clinics with on-site pharmacies, and certain other entities, can register with the DEA as “collectors” and become authorized at their discretion on a voluntary basis to accept controlled substances. The DEA Rule:

- Provides for the collection of controlled substances at Kiosk Drop-Off Sites at LEAs, pharmacies, and hospitals with on-site pharmacies;
- Provides for collection of controlled substances at Take-Back Events;
- Provides for the use of mail-back programs to collect controlled substances;
- Allows for the commingling of controlled and non-controlled substances;
- Establishes detailed collection, recordkeeping, security, and other measures for all approved collection methods; and
- Provides that all collected pharmaceutical products be destroyed so that the products are rendered non-retrievable.

The Plan is designed such that all entities that are part of the Program, including Vendor, are individually responsible to comply with their respective compliance obligations under the DEA Rule. Vendor will ensure that the collection, transportation, and disposal of Unwanted Medicine collected from Kiosk Drop-Off Sites, Mail-Back Services, and Take-Back Events, including controlled substances, complies with all DEA requirements, including those in DEA Rule § 1317.

Controlled substances collected pursuant to the Plan may be commingled with non-controlled substances at Kiosk Drop-Off Sites, Take-Back Events, and through Mail-Back Services per the DEA Rule. *See* DEA Rule §§ 1317.75(b) (Kiosk Drop-Off Sites); 1317.65(d) (Take-Back Events); 1317.70(b) (Mail-Back Services).

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<sup>5</sup> For Kiosk Drop-Off Site collection, only certain substances “that are lawfully possessed by an ultimate user or other authorized non-registrant person may be collected.” DEA Rule § 1317.75(b). This language is similar to, but slightly different than, provisions limiting collection at Take-Back Events and through Mail-Back Services to ultimate users or other persons (lawfully) entitled to dispose of an ultimate user decedent’s property. *See* DEA Rule §§ 1317.65(d); 1317.70(b).

## 1. DEA Registration Modification

Pursuant to DEA Rule § 1301.51(b), pharmacies may modify their registrations to become authorized collectors by submitting a written request to the DEA or online at [www.DEAdiversion.usdoj.gov](http://www.DEAdiversion.usdoj.gov). This request must contain:

- The registrant's name, address, and registration number (as printed on the registration certificate);
- The collection methods the registrant intends to conduct; and
- A signature in accordance with 21 C.F.R. § 1301.13(j).

See DEA Rule § 1301.51(b). MED-Project will consult with participating pharmacies, as requested, regarding how to modify DEA registrations to become authorized collectors.

## B. United States Department of Transportation (DOT)

When preparing Unwanted Medicine for transport and transporting Unwanted Medicine, Vendor or the Host-Assisted Collection Kiosk Drop Off-Site will ensure compliance with the DOT Hazardous Materials Regulations (HMR).

## C. California Board of Pharmacy

On June 8, 2017, the Board of Pharmacy adopted the Board of Pharmacy Regulations, Article 9.1 of Division 17 of Title 16 of the California Code of Regulations. Largely based on the DEA Rule, the Board of Pharmacy Regulations establish requirements applicable to pharmacies, hospitals/clinics with on-site pharmacies, distributors, and reverse distributors conducting certain drug take-back services. Among other things, the Board of Pharmacy Regulations provide:

- That California-licensed pharmacies and hospitals/clinics with on-site pharmacies must be in good standing with, and notify, the Board of Pharmacy to host a drug kiosk. *See* 16 CCR §§ 1776, 1776.1(i).
- That pharmacies must “know and adhere” to all applicable “federal, state, and local requirements governing the collection and destruction of dangerous drugs” when operating a drug take-back program. *See* 16 CCR § 1776.1(b).
- Drug kiosk placement and monitoring requirements. *See* 16 CCR §§ 1776.3(b)–(d).
- Drug kiosk inner liner, container, and signage requirements. *See* 16 CCR §§ 1776.3(f), (h), (m).
- Inner liner handling, storage, and destruction requirements for drug kiosks. *See, e.g.,* 16 CCR §§ 1776.3(h)–(j), 1776.5(a)–(c).
- Pharmacy and reverse distributor recordkeeping requirements. *See* 16 CCR §§ 1776.5(e)–(f), 1776.6.
- Pharmacy drug mail-back program requirements. *See* 16 CCR § 1776.2.

The Plan is designed such that all entities that are part of the Program, including Vendor, are individually responsible for complying with their respective compliance obligations under the Board of Pharmacy Regulations.

## XIII. Annual Report

An annual report will be provided to the Director on or before the date set by the Department and annually thereafter. Ordinance § 6.53.080. This report will be provided in the format required by the Ordinance § 6.53.080 and Regulations § 15. The total amount by weight collected by a Mail-Back Program will be provided using an average weight per Mail-Back Package, as provided by Vendor.

## Appendix A

### MED-Project Participants

The list of participating Producers in MED-Project's Program in the County is provided to the County on a periodic basis to satisfy Ordinance requirements.

## Appendix B

### Contact List for Outreach and Education to the Community

The following are Associations, Agencies, and Organizations that may be contacted for assistance with outreach and education to the community.

#### Health Systems:

Alameda County Medical Center  
Alameda Hospital  
Alta Bates Summit Medical Center  
Children's Hospital and Research Center  
Eden Medical Center  
Fremont Hospital  
Kaiser Foundation Hospital  
Kindred Hospital  
Mpi Chemical Dependency Recovery Hospital  
San Leandro Hospital  
St. Rose Hospital  
Telecare Heritage Psychiatric Health Facility  
Telecare Willow Rock Center  
Thunder Road Chemical Dependency Recovery Hospital  
Valley Memorial Hospital  
Valleycare Medical Center  
Washington Hospital

#### Health Associations and Societies:

California State Board of Pharmacy  
California Pharmacists Association  
The Medical Board of California  
California Nurses Association  
National Association of Social Workers California Chapter  
California Board of Registered Nursing  
California Board of Vocational Nursing  
California Department of Health Care Services  
California Health and Human Services Agency  
Alameda-Contra Costa Medical Association

#### Organizations, Districts, and Agencies:

Alameda County Public Health Department  
Alameda County Department of Environmental Health  
Alameda County Public Works Agency  
Health Program of Alameda County  
Alameda County Board of Supervisors  
Alameda County Fire Department  
American Medical Response Alameda County  
CalRecycle  
Recyclewhere.org

## Appendix C

### Interested Sites and Participating Kiosk Drop-Off Sites

MED-Project will provide the County with a list of participating Kiosk Drop-Off Sites on a periodic basis.

Site Name	Address	City	Zip Code	Status
ALAMEDA HOSPITAL	2070 CLINTON AVENUE	ALAMEDA	94501	ACTIVE
ALAMEDA POLICE DEPARTMENT	1555 OAK ST.	ALAMEDA	94501	ACTIVE SITE
BART POLICE DEPARTMENT	101 8TH ST	OAKLAND	94607	ACTIVE SITE
BERKELEY POLICE DEPARTMENT	2100 MARTIN LUTHER KING JR. WAY	BERKELEY	94704	ACTIVE SITE
CAPSULE PHARMACY	2557 MOWRY AVE	FREMONT	94538	ACTIVE SITE
CITY OF NEWARK POLICE DEPARTMENT	37101 NEWARK ST.	NEWARK	94560	ACTIVE SITE
CVS/PHARMACY #0331	2000 DRISCOLL RD	FREMONT	94539	ACTIVE SITE
CVS/PHARMACY #0414	14869 E 14TH ST	SAN LEANDRO	94578	ACTIVE SITE
CVS/PHARMACY #0816	22501 FOOTHILL BLVD	HAYWARD	94541	ACTIVE SITE
CVS/PHARMACY #09397	4405 1ST ST	LIVERMORE	94551	ACTIVE SITE
CVS/PHARMACY #09494	35080 NEWARK BLVD	NEWARK	94560	ACTIVE SITE
CVS/PHARMACY #09553	4349 SAN PABLO AVENUE	EMERYVILLE	94608	ACTIVE SITE
CVS/PHARMACY #09600	35720 FREMONT BLVD	FREMONT	94536	ACTIVE SITE
CVS/PHARMACY #09622	243 W JACKSON ST	HAYWARD	94544	ACTIVE SITE
CVS/PHARMACY #09635	1550 E 14TH STREET	SAN LEANDRO	94577	ACTIVE SITE
CVS/PHARMACY #09678	1500 1ST ST	LIVERMORE	94550	ACTIVE SITE
CVS/PHARMACY #09876	699 LEWELLING BLVD	SAN LEANDRO	94579	ACTIVE SITE



Site Name	Address	City	Zip Code	Status
CVS/PHARMACY #09904	3667 CASTRO VALLEY BLVD	CASTRO VALLEY	94546	ACTIVE SITE
CVS/PHARMACY #09941	1451 SHATTUCK AVE	BERKELEY	94709	ACTIVE SITE
CVS/PHARMACY #09942	1401 WASHINGTON AVE	SAN LEANDRO	94577	ACTIVE SITE
CVS/PHARMACY #09957	344 THOMAS L BERKLEY WAY	OAKLAND	94612	ACTIVE SITE
CVS/PHARMACY #10119	6750 BERNAL AVE	PLEASANTON	94566	ACTIVE SITE
CVS/PHARMACY #10121	2655 TELEGRAPH AVE	BERKELEY	94704	ACTIVE SITE
CVS/PHARMACY #10199	26059 MISSION BLVD	HAYWARD	94544	ACTIVE SITE
CVS/PHARMACY #10475	2964 BROADWAY	OAKLAND	94611	ACTIVE SITE
CVS/PHARMACY #10924	3010 BERNAL AVE	PLEASANTON	94566	ACTIVE SITE
CVS/PHARMACY #3024	7201 REGIONAL ST	DUBLIN	94568	ACTIVE SITE
CVS/PHARMACY #3026	2300 SHATTUCK AVE	BERKELEY	94704	ACTIVE SITE
CVS/PHARMACY #8431	7200 BANCROFT AVE	OAKLAND	94605	ACTIVE SITE
CVS/PHARMACY #9099	4020 FREMONT HUB	FREMONT	94538	ACTIVE SITE
CVS/PHARMACY #9128	2314 SANTA CLARA AVE	ALAMEDA	94501	ACTIVE SITE
CVS/PHARMACY #9130	175 41ST ST	OAKLAND	94611	ACTIVE SITE
CVS/PHARMACY #9226	3320 FRUITVALE AVE	OAKLAND	94602	ACTIVE SITE
CVS/PHARMACY #9234	46445 MISSION BLVD	FREMONT	94539	ACTIVE SITE
CVS/PHARMACY #9250	885 ISLAND DR STE A	ALAMEDA	94502	ACTIVE SITE
CVS/PHARMACY #9251	3999 SANTA RITA ROAD	PLEASANTON	94588	ACTIVE SITE
CVS/PHARMACY #9255	931 MARINA VILLAGE PKWY	ALAMEDA	94501	ACTIVE SITE
CVS/PHARMACY #9378	4100 REDWOOD RD	OAKLAND	94619	ACTIVE SITE
DUBLIN POLICE SERVICES	100 CIVIC PLAZA	DUBLIN	94568	ACTIVE SITE

Site Name	Address	City	Zip Code	Status
EDEN HOSPITAL (1ST KIOSK)	20103 LAKE CHABOT ROAD	CASTRO VALLEY	94546	INTERESTED
EDEN HOSPITAL (2ND KIOSK)	20103 LAKE CHABOT ROAD	CASTRO VALLEY	94546	INTERESTED
EMERYVILLE POLICE DEPARTMENT	2449 POWELL ST	EMERYVILLE	94608	ACTIVE SITE
HALLER'S PHARMACY AND MEDICAL SUPPLY	37323 FREMONT BLVD.	FREMONT	94536	ACTIVE SITE
HIGHLAND HOSPITAL OUTPATIENT PHARMACY (1ST KIOSK)	1411 E 31ST ST	OAKLAND	94602	ACTIVE SITE
HIGHLAND HOSPITAL OUTPATIENT PHARMACY (2ND KIOSK)	1411 E 31ST ST	OAKLAND	94602	ACTIVE SITE
JADE PHARMACY	34460 FREMONT BLVD, SUITE B	FREMONT	94555	ACTIVE SITE
KAISER FDN HLT PLAN FABIOLA 1 PHY 115	3801 HOWE ST.	OAKLAND	94511	ACTIVE SITE
KAISER HEALTH PLAN OHLONE PHY 162	39400 PASEO PADRE PKWAY	FREMONT	94538	ACTIVE SITE
KAISER HEALTH PLAN PEDIATRIC PHY 118	3505 BROADWAY	OAKLAND	94611	ACTIVE SITE
KAISER HEALTH PLAN SOUTH 1 PHY 471	7601 STONERIDGE	PLEASANTON	94588	ACTIVE SITE
KAISER PERMANENTE PHARMACY #102	3701 BROADWAY	OAKLAND	94611	ACTIVE SITE
KAISER PERMANENTE PHARMACY #105	3600 BROADWAY	OAKLAND	94611	ACTIVE SITE
KAISER PERMANENTE PHARMACY #241	3000 LOS POSITAS	LIVERMORE	94551	ACTIVE SITE

Site Name	Address	City	Zip Code	Status
KAISER PERMANENTE PHARMACY NO 101	2417 CENTRAL AVE.	ALAMEDA	94501	ACTIVE SITE
KAISER UNION CITY MAIN MOB 2 PHY #132	3553 WHIPPLE RD.	UNION CITY	94587	ACTIVE SITE
MISSION PHARMACY	22138 MISSION BLVD.	HAYWARD	94541	ACTIVE SITE
MOWRY MEDICAL PHARMACY	1999 MOWRY AVE., STE A	FREMONT	94538	ACTIVE SITE
NEW OAKLAND PHARMACY - LAKE MERRITT	250 E. 18TH ST.	OAKLAND	94606	ACTIVE SITE
NEW OAKLAND PHARMACY #2	388 9TH ST.	OAKLAND	94607	ACTIVE SITE
NEW OAKLAND PHARMACY_#1	333 9TH ST.	OAKLAND	94607	ACTIVE SITE
PIEDMONT POLICE DEPARTMENT	403 HIGHLAND AVE	PIEDMONT	94611	ACTIVE SITE
PLEASANTON POLICE DEPARTMENT	4833 BERNAL AVE.	PLEASANTON	94566	ACTIVE SITE
RITE AID 05918	3744 MOWRY AVENUE	FREMONT	94538	INTERESTED
RITE AID 05920	31091 MISSION BOULEVARD	HAYWARD	94544	INTERESTED
RITE AID 05922	3848 CASTRO VALLEY BOULEVARD	CASTRO VALLEY	94546	INTERESTED
RITE AID 05925	968 MURRIETA BOULEVARD	LIVERMORE	94550	INTERESTED
RITE AID 05937	1355 MACARTHUR BOULEVARD	SAN LEANDRO	94577	INTERESTED
RITE AID 05942	31836 ALVARADO BOULEVARD	UNION CITY	94587	INTERESTED
RITE AID 05943	1650 DECOTO ROAD	UNION CITY	94587	INTERESTED

Site Name	Address	City	Zip Code	Status
RITE AID 05944	2819 HOPYARD ROAD	PLEASANTON	94588	INTERESTED
RITE AID 05952	1991 MOUNTAIN BOULEVARD	OAKLAND	94611	INTERESTED
RITE AID 06456	1350 NORTH VASCO ROAD	LIVERMORE	94551	INTERESTED
SAN LEANDRO HOSPITAL	13855 EAST 14TH ST	SAN LEANDRO	94578	ACTIVE SITE
STANFORD EMERYVILLE HEALTH CENTER PHARMACY	5800 HOLLIS ST.	EMERYVILLE	94608	ACTIVE SITE
TEDS DRUGS	27453 HESPERIAN	HAYWARD	94545	ACTIVE SITE
TENNYSON PHARMACY	589 W. TENNYSON	HAYWARD	94544	ACTIVE SITE
UNITED PHARMACY	2929 TELEGRAPH AVE	BERKELEY	94705	ACTIVE SITE
VITACARE PHARMACY	2775 TELEGRAPH AVE	OAKLAND	94612	ACTIVE SITE
WASHINGTON HOSPITAL PHARMACY	2000 MOWRY AVE	FREMONT	94538	ACTIVE SITE
WELLSPRING PHARMACY	4184 C PIEDMONT AVE	OAKLAND	94611	ACTIVE SITE

## Appendix D

### Potential Additional Kiosk Drop-Off Sites

Site Name	Address	City	Zip
AHF PHARMACY	400 THIRTIETH ST STE 300	OAKLAND	94609
ALAMEDA PHARMACY LLC	1555 DOOLITTLE DRIVE #160	SAN LEANDRO	94577
ALTA BATES SUMMIT MED CTR-HERRICK CAMPUS	2001 DWIGHT WY	BERKELEY	94704
ALTA BATES SUMMIT MEDICAL CENTER - ALTA BATES CAMPUS	2450 ASHBY AVE	BERKELEY	94705
ALTA BATES SUMMIT MEDICAL CENTER - SUMMIT CAMPUS	350 HAWTHORNE AVE	OAKLAND	94609
ALTA BATES SUMMIT OUTPATIENT PHARMACY	2001 DWIGHT WAY STE 2182	BERKELEY	94704
BRADFORD PHARMACY INC.	445 8TH STREET	OAKLAND	94607
CALIFORNIA STATE UNIVERSITY, EAST BAY	25800 CARLOS BEE BLVD	HAYWARD	94542
CENTRAL ADMIXTURE PHARMACY SERVICES INC	48006 FREMONT BLVD	FREMONT	94538
CHILDREN'S HOSPITAL & RESEARCH CENTER AT OAKLAND	747 52ND ST	OAKLAND	94609
CHILDREN'S HSP MED CTR AMBULATORY CARE	744 52ND ST	OAKLAND	94609
CHILDRENS CLINIC PHARMACY	747 52ND STREET	OAKLAND	94609
CLEAR CHOICE PHARMACY	3059 HOPYARD RD STE C	PLEASANTON	94588
COMMUNITY A WALGREENS PHARMACY #16477	3009 BROADWAY	OAKLAND	94611
CORAM CVS/SPECIALTY INFUSION SERVICES	3160 CORPORATE PLACE	HAYWARD	94545
COSTCO PHARMACY #1061	28505 HESPERIAN BLVD	HAYWARD	94545
COSTCO PHARMACY #146	2800 INDEPENDENCE DRIVE	LIVERMORE	94550
COSTCO PHARMACY #778	43621 PACIFIC COMMONS BLVD	FREMONT	94538

COSTCO PHARMACY 118	1900 DAVIS STREET	SAN LEANDRO	94577
CPP PET CARE	3157 CORPORATE PL	HAYWARD	94545
CRESCENT HEALTHCARE	2547 BARRINGTON CT	HAYWARD	94545
CVS/PHARMACY # 16116	7200 AMADOR PLAZA RD	DUBLIN	94568
CVS/PHARMACY # 16275	4300 LAS POSITAS RD	LIVERMORE	94551
CVS/PHARMACY # 16764	15555 E 14TH ST STE 400	SAN LEANDRO	94578
CVS/PHARMACY # 16804	2499 WHIPPLE RD	HAYWARD	94544
CVS/PHARMACY # 17044	1057 ESTSHORE HWY	ALBANY	94710
CVS/PHARMACY # 17265	19661 HESPERIAN BLVD	HAYWARD	94541
CVS/PHARMACY # 17592	43950 PACIFIC COMMONS BLVD	FREMONT	94538
CVS/PHARMACY # 17624	1555 40TH STREET	EMERYVILLE	94608
CVS/PHARMACY # 17628	2800 DUBLIN BLVD	DUBLIN	94568
CVS/PHARMACY # 17657	2700 5TH ST	ALAMEDA	94501
CVS/PHARMACY # 17673	2187 SHATTUCK AVE	BERKELEY	94704
DOLPHIN HEALTH PHARMACY	7400 MACARTHUR BLVD NO A	OAKLAND	94605
DRATE PHARMACY	3219 ADELINE STREET	BERKELEY	94703
EAST BAY AIDS CENTER OUTPATIENT PHARMACY	3100 SUMMIT ST	OAKLAND	94609
ENTIRELYPETS PHARMACY	34571 SEVENTH ST	UNION CITY	94587
FAIRMONT HOSPITAL PHARMACY	15400 FOOTHILL BOULEVARD	SAN LEANDRO	94578
FOODMAXX PHARMACY #484	3100 EAST 9TH ST	OAKLAND	94601
FREMONT HOSPITAL	39001 SUNDALE DR	FREMONT	94538
FRUITVALE AVENUE PHARMACY	2693 FRUITVALE AVE	OAKLAND	94601

GARFIELD BEACH CVS LLC CVS/PHARMACY #10475	2964 BROADWAY	OAKLAND	94611
GARFIELD BEACH CVS LLC D/B/A CVS/PHARMACY # 17712	1414 UNIVERSITY AVE	BERKELEY	94702
HALLER'S LTC PHARMACY	4067 PERALTA BLVD	FREMONT	94536
HAYWARD SISTERS HOSPITAL DBA ST ROSE HOSPITAL	27200 CALAROGA AVE RM A1-108	HAYWARD	94545
HERRICK CAMPUS PHARMACY	2100 DWIGHT WAY RM 2113	BERKELEY	94704
HIGH STREET PHARMACY	4248 MACARTHUR BLVD	OAKLAND	94619
INTEGRATED MEDICAL ASSOCIATES PHARMACY INC	10500 MACARTHUR BLVD #103	OAKLAND	94605
JOHN GEORGE PSYCHIATRIC PAVILION PHY	2060 FAIRMONT DRIVE	SAN LEANDRO	94578
KAISER FDN HSP INP PHY 16A	39400 PASEO PADRE PARKWAY	FREMONT	94538
KAISER FOUNDATION CPP PHARMACY 251	300 G PULLMAN STREET	LIVERMORE	94550
KAISER FOUNDATION HOSPITAL PHARMACY #10A	275 W MACARTHUR BLVD	OAKLAND	94611
KAISER FOUNDATION HOSPITAL PHARMACY #92A	2500 MERCED ST HOSPITAL BLDG	SAN LEANDRO	94577
KAISER FOUNDATION HOSPITAL PHY #47B	7601 STONERIDGE DR RM 218	PLEASANTON	94588
KAISER HEALTH PLAN NILES 3 PHY 164	39400 PASEO PADRE PARKWAY	FREMONT	94538
KAISER HEALTH PLAN NILES PHY 161	39400 PASEO PADRE PARKWAY	FREMONT	94538
KAISER HEALTH PLAN NORTH 1 PHY 473	5600 STONERIDGE MALL ROAD	PLEASANTON	94588
KAISER HEALTH PLAN SOUTH 2 PHY 472	7601 STONERIDGE DR	PLEASANTON	94588
KAISER HLTH PLAN SLEEPY HOLLOW PHY 143	27303 SLEEPY HOLLOW AVENUE SOUTH	HAYWARD	94545
KAISER ONCOLOGY PHARMACY #104	3701 BROADWAY FLR 3	OAKLAND	94611
KAISER ONCOLOGY PHARMACY #165	39400 PASEO PADRE PKWY NILES BLDG 2ND FL	FREMONT	94538

KAISER PERMANENTE PHARMACY #181	1795 SECOND ST, SUITE B	BERKELEY	94710
KAISER PERMANENTE PHARMACY #921	2500 MERCED ST FL 1	SAN LEANDRO	94577
KAISER PERMANENTE PHARMACY #922	2500 MERCED ST 2ND FL RM 2966	SAN LEANDRO	94577
KINDRED HSP-SAN FRANCISCO BAY	2800 BENEDICT DR	SAN LEANDRO	94577
LA CLINICA DE LA RAZA	3451 E 12TH ST	OAKLAND	94601
LA CLINICA DE LA RAZA, INC.	1030 INTERNATIONAL BLVD	OAKLAND	94606
LIFESCRIP PHARMACY	7700 EDGEWATER DR #220	OAKLAND	94621
LIRX	1860 MOWRY AVE STE 102	FREMONT	94538
LUCKY PHARMACY #711	40055 MISSION BLVD	FREMONT	94539
LUCKY PHARMACY #712	34101 FREMONT BLVD	FREMONT	94555
LUCKY PHARMACY #714	5000 MOWRY AVE	FREMONT	94538
LUCKY PHARMACY #715	22555 MISSION BLVD	HAYWARD	94541
LUCKY PHARMACY #716	25151 SANTA CLARA ST	HAYWARD	94544
LUCKY PHARMACY #721	2000 PORTOLA AVE	LIVERMORE	94550
LUCKY PHARMACY #722	1951 HOLMES ST	LIVERMORE	94550
LUCKY PHARMACY #736	247 E 18TH ST	OAKLAND	94606
LUCKY PHARMACY #744	6155 W LAS POSITAS BLVD	PLEASANTON	94588
LUCKY PHARMACY #767	1300 FAIRMONT DR	SAN LEANDRO	94578
LUCKY PHARMACY #768	15840 HESPERIAN BLVD	SAN LORENZO	94580
LUCKY PHARMACY #782	32300 DYER ST	UNION CITY	94587
MASONIC HOME PHARMACY	34400 MISSION BLVD	UNION CITY	94587
MAXOR CORRECTIONAL PHARMACY SERVICES	C/O SANTA RITA JAIL	DUBLIN	94568



MAXOR CORRECTIONAL PHARMACY SERVICES	C/O GLENN DYER DETENTION FACILITY	OAKLAND	94607
MEDICAL ARTS PHARMACY	13847 E 14TH ST STE 103	SAN LEANDRO	94578
MOWRY PLAZA PHARMACY	668 MOWRY AVE	FREMONT	94536
MY LAN PHARMACY	401 EAST 18TH STREET - SUITE B	OAKLAND	94606
NEW CHINA TOWN PHARMACY	719 EAST 12TH STREET	OAKLAND	94606
NEW TIBURCIO VASQUEZ HEALTH CENTER PHY	33255 9TH STREET	UNION CITY	94587
NICHOLS HILL PRESCRIPTION PHARMACY	2844 SUMMIT STREET	OAKLAND	94609
OAKLAND CLINIC PHARMACY	5220 CLAREMONT AVE	OAKLAND	94618
OMNICARE OF HAYWARD	20967 CABOT BLVD	HAYWARD	94545
PACIFIC PHARMACY	650 INTERNATIONAL BLVD	OAKLAND	94606
PERALTA OUTPATIENT PHARMACY	3300 WEBSTER ST, GROUND FL	OAKLAND	94609
PHARMACA INTEGRATIVE PHARMACY INC	5729 COLLEGE AVE	OAKLAND	94618
PHARMACA INTEGRATIVE PHARMACY INC	1744 SOLANO AVE	BERKELEY	94707
PHARMERICA	32980 ALVARADO NILES RD STE 836	UNION CITY	94587
PLEASANT CARE PHARMACY	1652 B ST	HAYWARD	94541
RALEYS PHARMACY #315	39200 PASEO PADRE PARKWAY	FREMONT	94538
RALEYS PHARMACY #316	5420 SUNOL BLVD.	PLEASANTON	94566
REDWOOD LTC PHARMACY	3160 CASTRO VALLEY BLVD STE 101	CASTRO VALLEY	94546
SAFEWAY PHARMACY #0676	1500 SOLANO AVE	ALBANY	94706
SAFEWAY PHARMACY #0691	1444 SHATTUCK PLACE	BERKELEY	94709
SAFEWAY PHARMACY #0768	20629 REDWOOD RD	CASTRO VALLEY	94546

SAFEWAY PHARMACY #0908	3550 FRUITVALE AVE	OAKLAND	94602
SAFEWAY PHARMACY #0951	867 ISLAND DR	ALAMEDA	94502
SAFEWAY PHARMACY #0971	22280 FOOTHILLS BLVD	HAYWARD	94541
SAFEWAY PHARMACY #0993	3902 WASHINGTON BLVD	FREMONT	94538
SAFEWAY PHARMACY #1197	1790 DECOTO RD	UNION CITY	94587
SAFEWAY PHARMACY #1257	4495 FIRST ST	LIVERMORE	94551
SAFEWAY PHARMACY #1931	46848 MISSION BLVD	FREMONT	94539
SAFEWAY PHARMACY #1932	4440 TASSAJARA RD	DUBLIN	94568
SAFEWAY PHARMACY #1953	7499 DUBLIN BLVD	DUBLIN	94568
SAFEWAY PHARMACY #2708	2227 S SHORE CENTER	ALAMEDA	94501
SAFEWAY PHARMACY #2856	6790 BERNAL AVE	PLEASANTON	94566
SAFEWAY PHARMACY #2870	6310 COLLEGE AVE	OAKLAND	94618
SAFEWAY PHARMACY #3125	3889 SAN PABLO AVE	EMERYVILLE	94608
SAFEWAY PHARMACY #3132	5100 BROADWAY	OAKLAND	94611
SAFEWAY PHARMACY #3281	2600 5TH ST	ALAMEDA	94501
SKILLED NURSING PHARMACY	21150 CABOT BLVD	HAYWARD	94545
SOLEO HEALTH INC	1324 W WINTON AVE	HAYWARD	94545
STONERIDGE PROFESSIONAL PHARMACY	5720 STONERIDGE MALL RD STE 150	PLEASANTON	94588
SUTTER INFUSION & PHARMACY SERVICES	1105 ATLANTIC AVE STE 102	ALAMEDA	94501
TIB PHARMACY LLC	5886 MOWRY SCHOOL RD	NEWARK	94560
UNIVERSITY HEALTH SERVICE PHARMACY	2222 BANCROFT AVE RM 1115	BERKELEY	94702
VALLEY MEMORIAL HOSPITAL PHARMACY	111 EAST STANLEY BOULEVARD	LIVERMORE	94550
VALLEYCARE MEDICAL CENTER PHARMACY	5555 W LAS POSITAS BLVD 1ST FL	PLEASANTON	94588

VERSAILLES PHARMACY	2801 ENCINAL	ALAMEDA	94501
VIBRANT CARE PHARMACY INC	7400 MACARTHUR BLVD STE B	OAKLAND	94605
WAL MART PHARMACY 10 2031	30600 DYER STREET	UNION CITY	94587
WAL-MART PHARMACY 10-1972	2700 LAS POSITAS RD	LIVERMORE	94551
WAL-MART PHARMACY 10-5434	15555 HESPERIAN BLVD	SAN LEANDRO	94579
WAL-MART PHARMACY 10-5611	3112 SANTA RITA RD	PLEASANTON	94566
WALGREEN CO D/B/A WALGREENS #15330	5809 FOOTHILL BLVD	OAKLAND	94605
WALGREENS #00101	3382 CASTRO VALLEY BLVD	CASTRO VALLEY	94546
WALGREENS #01536	3434 HIGH STREET	OAKLAND	94619
WALGREENS #01537	3232 FOOTHILL BLVD	OAKLAND	94601
WALGREENS #01625	5055 TELEGRAPH AVE	OAKLAND	94609
WALGREENS #02150	1763 SANTA RITA RD	PLEASANTON	94566
WALGREENS #02306	1138 W TENNYSON_RD	HAYWARD	94544
WALGREENS #02314	1050 GILMAN ST	BERKELEY	94710
WALGREENS #02366	3860 DECOTO ROAD	FREMONT	94555
WALGREENS #02401	21463 FOOTHILL BLVD	HAYWARD	94541
WALGREENS #02426	15500 WASHINGTON AVE	SAN LEANDRO	94579
WALGREENS #02609	2995 SAN PABLO AVE	BERKELEY	94702
WALGREENS #02660	41400 BLACOW RD	FREMONT	94538
WALGREENS #03170	3400 TELEGRAPH AVE	OAKLAND	94609
WALGREENS #03295	8102 INTERNATIONAL BLVD	OAKLAND	94621
WALGREENS #04050	1916 WEBSTER ST	ALAMEDA	94501
WALGREENS #04517	2600 MOWRY AVE	FREMONT	94538

WALGREENS #04614	2801 ADELINE ST	BERKELEY	94703
WALGREENS #04659	164 W JACKSON ST	HAYWARD	94544
WALGREENS #06502	23958 HESPERIAN BLVD	HAYWARD	94541
WALGREENS #07274	1456 136TH AVE	SAN LEANDRO	94578
WALGREENS #09248	2300 OTIS DRIVE	ALAMEDA	94501
WALGREENS #10045	2310 TELEGRAPH AVE	BERKELEY	94704
WALGREENS #10526	3250 LAKESHORE AVE SUITE B	OAKLAND	94610
WALGREENS #11706	301 EAST 18TH STREET	OAKLAND	94606
WALGREENS #13595	1333 BROADWAY	OAKLAND	94612
WALGREENS #13858	1607 SHATTUCK AVE	BERKELEY	94709
WALGREENS #15025	2190 SHATTUCK AVE	BERKELEY	94704
WALGREENS #15163	1620 FIRST STREET	LIVERMORE	94550
WALGREENS #15666	1600 PARK ST	ALAMEDA	94501
WALMART PHARMACY #10-2989	44009 OSGOOD RD	FREMONT	94539
WALMART PHARMACY #10-5426	40580 ALBRAE ST	FREMONT	94538
WALMART PHARMACY 10 2161	4501 ROSEWOOD DRIVE	PLEASANTON	94588
WALMART PHARMACY NO 10 2648	1919 DAVIS STREET	SAN LEANDRO	94577
WELLSPRING COMPOUNDING PHARMACY	2320 WOOLSEY ST. #105	BERKELEY	94705
WEST OAKLAND HEALTH CENTER PHARM	700 ADELINE ST	OAKLAND	94607

## Appendix E

### Kiosk Mock-Up



**Kiosk Signage<sup>1</sup>**

Drop-Slot Panel Kiosk Art

Name: 123 Pharmacy

Contact: (555) 555-5555



**ACCEPTED:** MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.



**NOT ACCEPTED:** HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT DRUGS.

Please dispose of any items on the **NOT ACCEPTED** list at your local Hazardous Waste Facility.

Call **(800) 606-6606**

or visit [Household-HazWaste.org](https://Household-HazWaste.org) for details.

<sup>1</sup> Household Hazardous Waste facilities do not accept illicit drugs.

## Kiosk Signage

### Front Door Panel Kiosk Art

# SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES



1

Cross out or remove personal identifying information from the medicine bottle.



OR



2

Leave the product in its original container or place solid medicines in a sealed plastic bag.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*



3

Put medicine in the kiosk.

ONLY SCHEDULE II-V CONTROLLED AND NON-CONTROLLED SUBSTANCES THAT ARE LAWFULLY POSSESSED BY THE ULTIMATE USER ARE ACCEPTABLE TO BE PLACED IN THE KIOSK. SCHEDULE I CONTROLLED SUBSTANCES, ILLICIT OR DANGEROUS SUBSTANCES, AND ANY CONTROLLED SUBSTANCES NOT LAWFULLY POSSESSED BY THE ULTIMATE USER MAY NOT BE PLACED IN THE KIOSK.

**⚠ PROP 65 WARNING:** Entering this area, or coming into contact with items or materials in this kiosk, can expose you to chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. For more information, go to [www.P65Warnings.ca.gov](http://www.P65Warnings.ca.gov).

For more information about the MED-Project program, please go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-PROJECT.

**MED-Project™**  
Medication Education & Disposal



Kiosk Signage

Side Panel Kiosk Art

# SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES



MED-Project Call Center: 1 844 MED-PROJECT  
or 1 (844) 633-7765.  
[www.med-project.org](http://www.med-project.org)

**MED-Project**<sup>TM</sup>

Medication Education & Disposal



## Appendix F

### Media List

The following is a representative list of key media outlets to help educate Residents about proper disposal of expired or Unwanted Medicine. The list includes local print, online, television, and radio outlets, as well as outlets specifically targeting the diverse demographic communities within the County.

Print Outlets	Coverage Area	Website
Alameda Sun	Alameda County	<a href="http://alamedasun.com/">http://alamedasun.com/</a>
Berkeley Daily Planet	Berkeley	<a href="http://berkeleydailyplanet.com">http://berkeleydailyplanet.com</a>
Berkeley Voice	Berkeley	<a href="https://www.eastbaytimes.com/location/berkeley/">https://www.eastbaytimes.com/location/berkeley/</a>
Berkeleyside	Berkeley	<a href="http://www.berkeleyside.com">http://www.berkeleyside.com</a>
California Magazine	Berkeley	<a href="https://alumni.berkeley.edu/california-magazine">https://alumni.berkeley.edu/california-magazine</a>
Castro Valley Forum (Weekly newspaper)	Alameda County	<a href="http://castrovalleyforum.com/home.html">http://castrovalleyforum.com/home.html</a>
Castro Valley News	Alameda County	<a href="https://castrovalleynewsgroup.com/category/castro-valley/">https://castrovalleynewsgroup.com/category/castro-valley/</a>
Castro Valley Times	Castro Valley	<a href="https://www.eastbaytimes.com/location/castro-valley/">https://www.eastbaytimes.com/location/castro-valley/</a>
Center for Investigative Reporting	Berkeley	
Contra Costa Times	Alameda County	<a href="http://www.eastbaytimes.com/">http://www.eastbaytimes.com/</a>
Dublin Tri Valley Herald	Dublin	<a href="https://www.eastbaytimes.com/location/tri-valley/">https://www.eastbaytimes.com/location/tri-valley/</a>
E'ville Eye Community News	Alameda County	<a href="http://www.evilleeye.com/">http://www.evilleeye.com/</a>
Nichi Bei Times (Japanese/English)	Alameda County	<a href="http://www.EastBayExpress.com/">http://www.EastBayExpress.com/</a>
East Bay Express	Oakland	<a href="https://www.eastbayexpress.com">https://www.eastbayexpress.com</a>
East Bay Times	Alameda County	<a href="https://www.eastbaytimes.com">https://www.eastbaytimes.com</a>
East Bay Express	Alameda County	<a href="https://www.eastbayexpress.com">https://www.eastbayexpress.com</a>
Fremont Bulletin	Alameda County	<a href="http://www.mercurynews.com/fremont">http://www.mercurynews.com/fremont</a>

Print Outlets	Coverage Area	Website
Fremont Tribune	Alameda County	<a href="http://www.fremonttribune.com/">http://www.fremonttribune.com/</a>
Hayward Daily Review (SEE Oakland Tribune)	Alameda County	<a href="http://haywardnews.ca/">http://haywardnews.ca/</a>
The Independent	Dublin, Livermore, Pleasanton	<a href="http://www.independentnews.com">http://www.independentnews.com</a>
Inter-City Express	Oakland	<a href="http://www.intercityexpress.news">www.intercityexpress.news</a>
La Opinion (Spanish)	Alameda County	<a href="http://www.laopinion.com/">http://www.laopinion.com/</a>
Oakland Local	Oakland	<a href="http://oaklandlocal.com/">http://oaklandlocal.com/</a>
Oakland Post	Alameda County	<a href="http://www.oaklandpost.org">http://www.oaklandpost.org</a>
Oakland Tribune	Alameda County	<a href="https://www.eastbaytimes.com">https://www.eastbaytimes.com</a>
Pleasanton Weekly	Alameda County	<a href="https://www.pleasantonweekly.com">https://www.pleasantonweekly.com</a>
San Francisco Chronicle	Alameda County	<a href="https://www.sfchronicle.com">https://www.sfchronicle.com</a>
San Leandro Times	Alameda County	<a href="http://sanleandrotimes.com/home.html">http://sanleandrotimes.com/home.html</a>
The Alamedan	Alameda County	<a href="http://thealamedan.org">http://thealamedan.org</a>
The Argus	Alameda County	<a href="https://www.eastbaytimes.com/location/fremont/">https://www.eastbaytimes.com/location/fremont/</a>
The Daily Californian (UC Berkeley)	Alameda County	<a href="http://www.dailycal.org">http://www.dailycal.org</a>
The Montclarion	Oakland	<a href="http://themontclarion.org">http://themontclarion.org</a>
The Piedmont Post	Piedmont	<a href="http://www.piedmontportal.org/the-piedmont-post/">http://www.piedmontportal.org/the-piedmont-post/</a>
Tri-Valley Times	Pleasanton	<a href="https://www.eastbaytimes.com/location/tri-valley/">https://www.eastbaytimes.com/location/tri-valley/</a>
Tri-City Voice	Alameda County	<a href="http://www.tricityvoice.com/">http://www.tricityvoice.com/</a>
Vision Hispana	Oakland, Hayward	<a href="http://www.visionhispanausa.com">http://www.visionhispanausa.com</a>
Your Town Monthly	Alameda County	<a href="http://yourtownmonthly.com">http://yourtownmonthly.com</a>

Television Outlets	Network
BAVC	Public Access
KDTV	Univision
KEMO	Azteca America
KGO	ABC
KNTV	NBC
KPIX	CBS
KQED	PBS
KRON	Media General
KSTS	Telemundo
KTVU	FOX

Radio Outlets	City/County/Coverage Area
KALW FM 91.7	San Francisco
KCBS AM 740	San Francisco
KCSF (College app radio)	San Francisco
KGO AM 810	San Francisco
KQED FM 88.5	San Francisco
KSFO AM 560	San Francisco
KUSF (College online radio)	San Francisco
KPFB FM 89.3	Berkeley
KALX FM 90.7	Berkeley
KNGY FM 92.7	Alameda
KPFA FM 94.1	Berkeley
KKIQ FM 101.7	Livermore
KBLX FM 102.9	Berkeley
KNEW AM 910	Oakland
KKGN AM 960	Oakland
KMKY AM 1310	Oakland
KVTO AM 1400	Berkeley
KPIG AM 1510	Piedmont
KACR FM 96.1	Alameda
KCRH FM 89.9	Hayward
KPOO 89.5	San Francisco
KSMC 89.5	Moraga
KCSM 91.1	San Mateo

Radio Outlets	City/County/Coverage Area
KKDV 92.1	Walnut Creek
KRZZ 93.3	San Francisco
KYLD 94.9	San Francisco
KBWF 95.7	San Francisco
KOIT 96.5	San Francisco
KLLC 97.3	San Francisco
KISQ 98.1	San Francisco
KSOL 98.9	San Francisco
KMVQ 99.7	San Francisco
KBRG 100.3	San Jose
KVVZ 100.7	San Rafael
KIOI 101.3	San Francisco
KDFC 102.1	San Francisco
KKSF 103.7	San Francisco
KFOG 104.5	San Francisco
KITS 105.3	San Francisco
KVVF 105.7	Santa Clara
KMEL 106.1	San Francisco
KFRC 106.9	San Francisco
KSTN 107.3	Stockton
KSAN 107.7	San Mateo
KSFO 560 AM	San Francisco
KEAR 610 AM	San Francisco

Radio Outlets	City/County/Coverage Area
KSTE 650 AM	Rancho Cordova
KNBR 680 AM	San Francisco
KFIA 710 AM	Carmichael
KCBC 770 AM	Riverbank
KTRB 860 AM	San Francisco
KATD 990 AM	Pittsburg
KIQI 1010 AM	San Francisco
KTCT 1050 AM	San Mateo
KFAX 1100 AM	San Francisco
KHTK 1140 AM	Sacramento
KLOK 1170 AM	San Jose
KDYA 1190 AM	Vallejo
KNTS 1220 AM	Palo Alto
KSRO 1350 AM	Santa Rosa
KZSF 1370 AM	San Jose
KEST 1450 AM	San Francisco
KTOB 1490 AM	Petaluma
KFBK 1530 AM	Sacramento
KYCY 1550 AM	San Francisco
KLIV 1590 AM	San Jose
KDIA 1640 AM	Vallejo
KEBR 88.1	Sacramento
KECG 88.1	El Cerrito

Radio Outlets	City/County/Coverage Area
KXPR 88.9	Sacramento
KOHL 89.3	Fremont
KREV 92.7	Alameda
KSFN 1510 AM	Piedmont

## Appendix G

### MED-Project Request for Approval of Disposal Process for Host-Assisted Collection Kiosk Drop-Off Sites

#### MED-PROJECT REQUEST FOR APPROVAL OF DISPOSAL PROCESS FOR HOST-ASSISTED COLLECTION KIOSK DROP-OFF SITES



February 15, 2019



## **MED-PROJECT REQUEST FOR APPROVAL OF DISPOSAL PROCESS FOR HOST-ASSISTED COLLECTION KIOSK DROP-OFF SITES**

Pursuant to Alameda County Safe Drug Disposal Ordinance (“Ordinance”) § 6.53.060(A) and Alameda County Safe Drug Disposal Regulations (“Regulations”) § 17, MED-Project LLC (“MED-Project”) requests the Alameda County Department of Environmental Health’s (the “Department’s”) approval to use a municipal waste combustor for the disposal of materials collected at Host-Assisted Collection Kiosk Drop-Off Sites (as defined in the MED-Project Product Stewardship Plan (“Plan”) § III). As described below, exercising discretion to allow for the disposal of materials collected at Host-Assisted Collection Kiosk Drop-Off Sites would achieve the objectives of the Ordinance and Regulations and should be approved under Ordinance § 6.53.060(A) and Regulations § 17.

### **I. THE PROCESS FOR THE DISPOSAL OF MATERIALS FROM HOST-ASSISTED COLLECTION KIOSK DROP-OFF SITES AT COVANTA LONG BEACH**

To provide effective and uninterrupted collection from Host-Assisted Collection Kiosk Drop-Off Sites, MED-Project has identified two vendors that it may use to provide and dispose of unwanted medicine. This request for approval concerns Covanta Environmental Solutions, LLC (“Covanta”).

MED-Project is proposing that materials collected at Host-Assisted Collection Kiosk Drop-Off Sites be delivered by United Parcel Service, Inc. to the Covanta Environmental Solutions, LLC facility in Scottsdale, Arizona. *See* Plan § X. From there, the materials will be transported by Transchem Environmental, LLC to the Covanta Long Beach Renewable Energy<sup>1</sup> facility in Long Beach, California (“Covanta Long Beach”)<sup>2</sup> for destruction via incineration. *Id.* Two DEA witnesses from Covanta will monitor delivery from the reverse distribution vault to Covanta Long Beach. A DEA witness will then confirm the destruction of the collected materials in the tracking system and upload the DEA certificate of destruction.

Covanta Long Beach is a municipal waste combustor. Covanta Long Beach is a waste-to-energy facility that processes up to 1,380 tons of municipal solid waste per day, generating up to 36 megawatts of electricity. Covanta Long Beach also has a Clean Air Act Title V permit, which establishes air emissions limits for particulate matter, carbon monoxide, sulfur dioxide, nitrogen oxides, lead, mercury, and fluorides, among other chemicals. To control air pollution, Covanta Long Beach employs semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a nitrogen oxide control system, a mercury control system, activated carbon filter units, and a continuous emissions monitoring system.

### **II. STANDARD FOR DEPARTMENT TO APPROVE THE USE OF COVANTA LONG BEACH FOR THE DISPOSAL OF MATERIALS FROM HOST-ASSISTED COLLECTION KIOSK DROP-OFF SITES**

The Regulations allow the “Plan Liaison” (as defined in Regulations § 2) to request an “exception, exemption, or allowance from any requirement of the Ordinance or Regulations,” which the “Department shall have the discretion to grant or deny . . .” Regulations § 17. Any disposal of unwanted medicine must comply with the overarching Ordinance disposal requirement that “[e]ach Product Stewardship Program must comply with all local, state, and federal laws and regulations applicable to its operations, including laws and regulations governing the disposal of medical waste and Controlled Substances.” Ordinance § 6.53.060(A); *cf.* Ordinance § 6.53.120(B) (“This Chapter shall be construed so as not to conflict with applicable federal or state laws, rules or regulations.”).

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<sup>1</sup> The Southeast Resource Recovery Facility is operating as Covanta Long Beach Renewable Energy. *See* Covanta, Covanta Long Beach, <https://www.covanta.com/Our-Facilities/Covanta-Long-Beach> (last visited Aug. 19, 2018).

<sup>2</sup> Covanta Long Beach’s mailing address is 118 pier S Avenue, Long Beach, CA 90802.

### **III. THE USE OF COVANTA LONG BEACH TO DISPOSE OF MATERIALS FROM HOST-ASSISTED COLLECTION KIOSK DROP-OFF SITES SHOULD BE APPROVED**

The Department should approve the use of Covanta Long Beach for disposal of materials from Host-Assisted Collection Kiosk Drop-Off Sites under Ordinance § 6.53.060(A) and Regulations § 17 because disposal at Covanta Long Beach would comply with federal and state law, improve MED-Project unwanted medicine collection services for residents, and protect and preserve the environment and the public health, safety, and welfare of Alameda County residents.

#### **A. Disposal at Covanta Long Beach Complies with Federal and State Law.**

There are no other laws or requirements, outside of the Ordinance, that would require MED-Project to dispose of unwanted medicine collected from Host-Assisted Collection Kiosk Drop-Off Sites at a hazardous waste incinerator or medical waste incinerator or preclude MED-Project from disposing of these materials at a municipal waste combustor like Covanta Long Beach. Any unwanted medicine collected at Host-Assisted Collection Kiosk Drop-Off Sites under this Plan is considered “household waste” excluded from regulation as hazardous or medical waste. Therefore, disposal of unwanted medicine at Covanta Long Beach in accordance with DEA requirements complies with all applicable federal and state laws, regulations, and other legal requirements. In fact, municipal waste combustors like Covanta Long Beach are one of the disposal methods the United States Environmental Protection Agency directs law enforcement agencies to use for the destruction of collected pharmaceutical products. *See* United States Environmental Protection Agency, Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Programs at 2, 4 (Sept. 11, 2018).

#### **B. Disposal of Unwanted Medicine at Covanta Long Beach Improves MED-Project Services for Residents.**

MED-Project requests approval to use Covanta Long Beach to create redundancy in its unwanted medicine collection and disposal services. By adding Covanta as a Host-Assisted Collection Kiosk Drop-Off Site vendor and Covanta Long Beach as a disposal facility, MED-Project can protect against service interruptions. Should Covanta or MED-Project’s other vendor servicing Host-Assisted Collection Kiosk Drop-Off Sites, Stericycle Specialty Waste Solutions, Inc., experience an incident requiring it to temporarily suspend services, MED-Project can continue to rely on the other vendor to provide service for Alameda County residents.

#### **C. Disposal at Covanta Long Beach Would Protect and Preserve the Environment and the Public Health, Safety, and Welfare of Alameda County Residents.**

The Department should exercise its authority to approve the use of Covanta Long Beach for disposal of unwanted medicine from Host-Assisted Collection Kiosk Drop-Off Sites under Ordinance § 6.53.060(A) and Regulations § 17 because disposal at Covanta Long Beach would protect and preserve the environment and the public health, safety, and welfare of Alameda County residents in furtherance of the objectives of the Ordinance. Municipal waste combustors like Covanta Long Beach are subject to stringent environmental requirements, as well as worker health and safety standards like other incinerators. Covanta Long Beach is subject to a Clean Air Act Title V permit for air emissions, and the facility has extensive air pollution controls in place, including semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a nitrogen oxide control system, a mercury control system, activated carbon filter units, and a continuous emissions monitoring system.

The permits and other requirements that apply to Covanta Long Beach provide for and promote the health, safety, and welfare of the general public. Accordingly, the Department should exercise its discretion under Regulations § 17 to approve Covanta Long Beach as a disposal site for materials collected at Host-Assisted Collection Kiosk Drop-Off Sites.

#### **IV. CONCLUSION**

For the reasons described above, the Department should approve the disposal of unwanted medicine from Host-Assisted Collection Kiosk Drop-Off Sites as proposed by MED-Project under Ordinance § 6.53.060(A) and Regulations § 17. Please contact the Plan Liaison, identified below, with any questions about this request.

Dr. Victoria Travis, PharmD, MS, MBA  
National Program Director  
MED-Project LLC  
1800 M Street NW, Suite 400 S  
Washington, DC 20036  
Phone: 1 (844) 677-6532  
Fax: 1 (510) 686-8837  
[alamedacounty@med-project.org](mailto:alamedacounty@med-project.org)

## Appendix H

### A. Stericycle Standard Mail-Back Package



#### Description:

Plastic envelope with return label and instructional flyer

#### Package Size:

Outer dimensions: 8.25" x 12"

Inner dimensions: 7.375" x 10.375"

MED-Project may choose to change its Vendor for Mail-Back Services at any time. Any proposed changes to Vendor will be submitted in writing to the Department and approved by the Department in writing prior to implementation of any change.

## B. Covanta Standard Mail-Back Package

### ENVELOPE

USPS Certified water-and spill-proof, tamper-evident, tear-resistant, and sealable.

### USPS /NCSC Certified Label



Tracked  
from origination to  
destruction.

Dual encoded serial  
numbers printed on  
label and envelope.

MED-Project may choose to change its Vendor for Mail-Back Services at any time. Any proposed changes to Vendor will be submitted in writing to the Department and approved by the Department in writing prior to implementation of any change.

### **C. PureWay Inhaler Mail-Back Package Specifications**

**Description:**

Inhaler Mail-Back Package including container with mail-back packaging, return label, and instructional flyer.

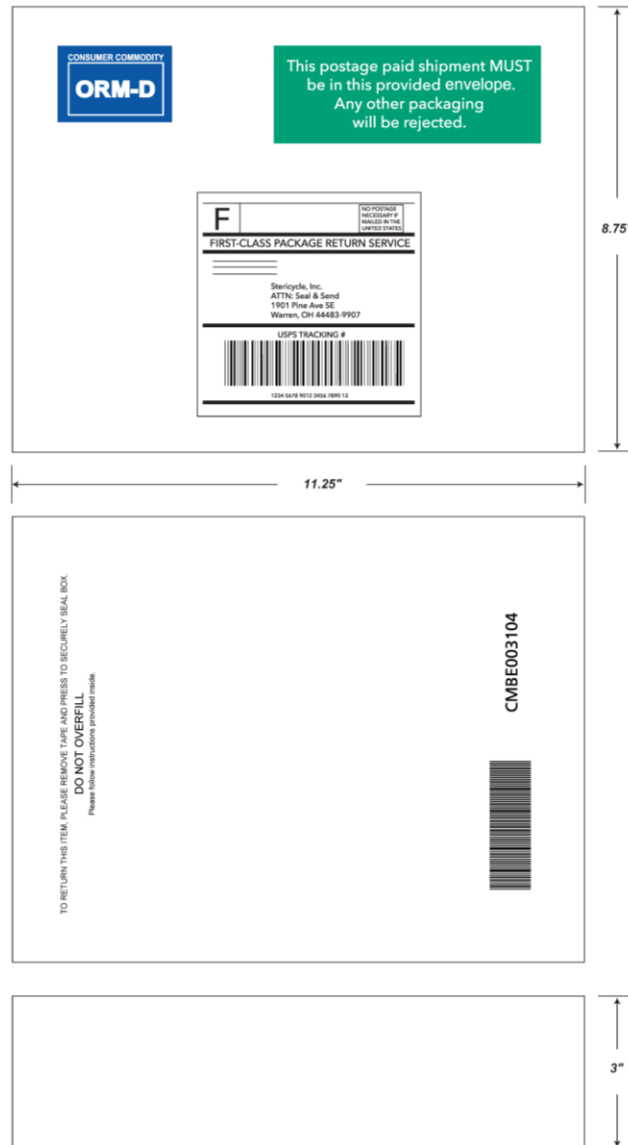
**Package Sizes:**

2.5-gallon mail-back system

Mail-back solutions are an example of complete, turnkey systems to provide for the safe return of inhaler waste through Carrier.

MED-Project may choose to change its Vendor for Mail-Back Services at any time. Any proposed changes to Vendor will be submitted in writing to the Department and approved by the Department in writing prior to implementation of any change.

#### D. Stericycle Inhaler Mail-Back Package



#### Description:

Inhaler Mail-Back Package including container with mail-back packaging, return label, and instructional flyer.

#### Package Sizes:

Outer dimensions: 8.75"x 11.25"x 3"

Mail-back solutions are an example of complete, turnkey systems to provide for the safe return of inhaler waste through Carrier.

MED-Project may choose to change its Vendor for Mail-Back Services at any time. Any proposed changes to Vendor will be submitted in writing to the Department and approved by the Department in writing prior to implementation of any change.

## Appendix I

### MED-Project Request for Approval of Standard Mail-Back Package Disposal Process

#### MED-PROJECT REQUEST FOR APPROVAL OF STANDARD MAIL-BACK PACKAGE DISPOSAL PROCESS



February 15, 2019



## **MED-PROJECT REQUEST FOR APPROVAL OF STANDARD MAIL-BACK PACKAGE DISPOSAL PROCESS**

Pursuant to Alameda County Safe Drug Disposal Ordinance (“Ordinance”) § 6.53.060(A) and Alameda County Safe Drug Disposal Regulations (“Regulations”) § 17, MED-Project LLC (“MED-Project”) requests the Alameda County Department of Environmental Health’s (the “Department’s”) approval to use permitted municipal waste combustors for the disposal of “Standard Mail-Back Packages” for unwanted medicine (as defined in the MED-Project Product Stewardship Plan (“Plan”) § III). As described below, exercising discretion to allow for the disposal of Standard Mail-Back Packages at municipal waste combustors would achieve the objectives of the Ordinance and Regulations and should be approved under Ordinance § 6.53.060(A) and Regulations § 17.

### **I. THE PROCESS FOR THE DISPOSAL OF STANDARD MAIL-BACK PACKAGES**

To provide effective and uninterrupted “Standard Mail-Back Services” (as defined in Plan § III), MED-Project has identified two vendors that it may use to provide and dispose of Standard Mail-Back Packages. This request for approval concerns Covanta Environmental Solutions, LLC (“Covanta”).

#### **A. The Covanta Process**

Standard Mail-Back Packages provided by Covanta would be pre-addressed and pre-paid for delivery to the Covanta Manheim, Pennsylvania United States Drug Enforcement Agency (“DEA”) registered collector and reverse distributor facility (“Manheim Facility”). From the Manheim Facility, the mail-back packages are transported by Doncin Transport, Inc. to one of two Covanta facilities—the Covanta York Renewable Energy, LLC facility in York, Pennsylvania (“Covanta York”)<sup>1</sup> and the Covanta Lancaster, Inc. facility in Lancaster, Pennsylvania (“Covanta Lancaster”)<sup>2</sup> (together, the “Covanta Facilities”)—for destruction via incineration. *See* Plan § X. The Covanta Facilities will scan the unique identifier on each Standard Mail-Back Package to record receipt of the package before incinerating it and will confirm the materials have been properly incinerated.

##### **a. Covanta York**

Covanta York is a permitted large municipal waste combustor. As an “energy-from-waste” facility, Covanta York uses solid waste, like Standard Mail-Back Packages, to generate electricity.<sup>3</sup> The facility processes over 1,300 tons of solid waste per day, generating up to 40 megawatts of electricity, enough to power over 20,000 homes, according to its website. To control air pollution, Covanta York employs a niro spray drying atomizer, a Western Pacific filter baghouse, and Norit Americas carbon injection. Covanta York also operates under a Title V Clean Air Act permit<sup>4</sup> and a solid waste permit.<sup>5</sup> Additionally, Covanta York has been designated as a Voluntary Protection Program (“VPP”) Star facility by the U.S. Occupational Safety and Health Administration (“OSHA”), recognizing the facility’s employer’s and employees’ exemplary achievement in the prevention and control of occupational safety and health hazards. Covanta York has also been awarded ISO-14001 certification for the facility’s environmental management system.

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<sup>1</sup> Covanta York’s mailing address is 2651 Blackbridge Road, York, PA 17406.

<sup>2</sup> Covanta Lancaster’s mailing address is 1911 River Road, Bainbridge, PA 17502.

<sup>3</sup> *See* Covanta, Covanta York, <https://www.covanta.com/Our-Facilities/Covanta-York>.

<sup>4</sup> *See* Title V Operating Permit # 67-05006, [http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/PermitDocuments/1141655167-050061\\_Issued\\_v1.pdf](http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/PermitDocuments/1141655167-050061_Issued_v1.pdf).

<sup>5</sup> *See* Solid Waste Permit # 400561 PaDEP, [https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults\\_singleFacility.aspx?FacilityID=471124](https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleFacility.aspx?FacilityID=471124).

b. Covanta Lancaster

Covanta Lancaster is also a permitted large municipal waste combustor. Covanta Lancaster is an “energy-from-waste” facility that incinerates waste and generates 35.7 megawatts per day from a condensing steam turbine that provides energy to GPU Energy.<sup>6</sup> Covanta Lancaster employs semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a furnace dry-lime injection system, a nitrogen oxide control system, a mercury control system, and a continuous emissions monitoring system. Covanta Lancaster also operates under a Title V Clean Air Act permit<sup>7</sup> and a solid waste permit.<sup>8</sup> Covanta Lancaster is a “zero discharge” facility, meaning that the wastewater generated on-site is treated and reused in the waste management process, according to the facility’s website. Covanta Lancaster has also been designated as a VPP Star facility by OSHA.

**II. STANDARD FOR DEPARTMENT TO APPROVE THE USE OF THE PROPOSED INCINERATORS FOR THE DISPOSAL OF STANDARD MAIL-BACK PACKAGES**

The Regulations allow the “Plan Liaison” (as defined in Regulations § 2) to request an “exception, exemption, or allowance from any requirement of the Ordinance or Regulations,” which the “Department shall have the discretion to grant or deny . . .” Regulations § 17. Any disposal of Standard Mail-Back Packages must comply with the overarching Ordinance disposal requirement that “[e]ach Product Stewardship Program must comply with all local, state, and federal laws and regulations applicable to its operations, including laws and regulations governing the disposal of medical waste and Controlled Substances.” Ordinance § 6.53.060(A); *cf.* Ordinance § 6.53.120(B) (“This Chapter shall be construed so as not to conflict with applicable federal or state laws, rules or regulations.”).

**III. THE USE OF THE PROPOSED INCINERATORS TO DISPOSE OF STANDARD MAIL-BACK PACKAGES SHOULD BE APPROVED**

The Department should approve the use of the proposed incinerators for disposal of Standard Mail-Back Packages under Ordinance § 6.53.060(A) and Regulations § 17 because disposal at the proposed incinerators would comply with federal and state law, improve MED-Project unwanted medicine collection services for residents, and protect and preserve the environment and the public health, safety, and welfare of Alameda County residents.

A. Disposal at the Covanta Facilities Complies with Federal and State Law

There are no other laws or requirements, outside of the Ordinance, that would require MED-Project to dispose of Standard Mail-Back Packages at a hazardous waste incinerator or medical waste incinerator or preclude MED-Project from disposing of these materials at a municipal waste combustor like the Covanta Facilities. Any unwanted medicines collected via Standard Mail-Back Packages under this Plan are considered “household waste” excluded from regulation as hazardous or medical waste. Therefore, disposal of Standard Mail-Back Packages at the Covanta Facilities in accordance with DEA requirements complies with all applicable federal and state laws, regulations, and other legal requirements. In fact, municipal waste combustors like the Covanta Facilities are one of the disposal methods the United States Environmental Protection Agency directs law enforcement agencies to use for the destruction of collected pharmaceutical products. *See* United States Environmental Protection Agency, Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Programs at 2, 4 (Sept. 11, 2018).

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<sup>6</sup> *See* Covanta, Covanta Lancaster, <https://www.covanta.com/Our-Facilities/Covanta-Lancaster>.

<sup>7</sup> *See* Title V Operating Permit # 36-05013, [http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/PermitDocuments/1130890\[36-05013\]\\_Issued\\_v1.pdf](http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/PermitDocuments/1130890[36-05013]_Issued_v1.pdf).

<sup>8</sup> *See* Solid Waste Permit # 400592 PaDEP, [https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults\\_singleFacility.aspx?FacilityID=255039](https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleFacility.aspx?FacilityID=255039).

B. Disposal of Standard Mail-Back Packages at the Covanta Facilities Improves MED-Project Services for Residents

MED-Project requests approval to use the proposed incinerators to create redundancy in its Standard Mail-Back Services. By adding Covanta as a Standard Mail-Back Services vendor, MED-Project can protect against Standard Mail-Back Service interruptions. Should Covanta or MED-Project's other vendor for Standard Mail-Back Services, Stericycle Specialty Waste Solutions, Inc., experience an incident requiring it to temporarily suspend Standard Mail-Back Services for any reason, MED-Project can continue to rely on the other vendor to provide service for Alameda County residents.

C. Disposal at the Proposed Facilities would Protect and Preserve the Environment and the Public Health, Safety, and Welfare of Alameda County Residents.

The Department should exercise its authority to approve the use of the proposed incinerators for disposal of Standard Mail-Back Packages under Ordinance § 6.53.060(A) and Regulations § 17 because disposal at the proposed incinerators would protect and preserve the environment and the public health, safety, and welfare of Alameda County residents in furtherance of the objectives of the Ordinance.

Covanta York has extensive pollution control technologies in place, including its use of a niro spray drying atomizer, a Western Pacific filter baghouse, and Norit Americas carbon injection. It has also been recognized for its workplace safety achievements, as evidenced by its status as a VPP Star facility. Covanta Lancaster has extensive pollution control technologies in place, including semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a nitrogen oxide control system, a mercury control system, and a continuous emissions monitoring system. It has also been recognized for its workplace safety achievements, as evidenced by its status as a VPP Star facility. The use of Covanta York and Covanta Lancaster would protect and preserve the environment and the public health, safety, and welfare of Alameda County residents in furtherance of the objectives of the Ordinance.

#### IV. CONCLUSION

Accordingly, the Department should approve the disposal of Standard Mail-Back Packages via incineration at Covanta York and Covanta Lancaster as proposed by MED-Project under Ordinance § 6.53.060(A) and Regulations § 17. Please contact the Plan Liaison, identified below, with any questions about this request.

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## Appendix J

### MED-Project Request for Approval of Inhaler Mail-Back Package Disposal Process

#### **MED-PROJECT REQUEST FOR APPROVAL OF INHALER MAIL-BACK PACKAGE DISPOSAL PROCESS**

# **MED-Project**

Medication Education & Disposal

February 15, 2019

## **MED-PROJECT REQUEST FOR APPROVAL OF INHALER MAIL-BACK PACKAGE DISPOSAL PROCESS**

Pursuant to Alameda County Safe Drug Disposal Ordinance (“Ordinance”) § 6.53.060(A) and Alameda County Safe Drug Disposal Regulations (“Regulations”) § 17, MED-Project LLC (“MED-Project”) requests the Alameda County Department of Environmental Health’s (the “Department’s”) approval to use permitted municipal waste combustors for the disposal of “Inhaler Mail-Back Packages” (as defined in the MED-Project Product Stewardship Plan (“Plan”) § III). As described below, exercising discretion to allow for the disposal of Inhaler Mail-Back Packages at a permitted municipal waste combustor would achieve the objectives of the Ordinance and Regulations and should be approved under Ordinance § 6.53.060(A) and Regulations § 17.

### **I. THE PROCESS FOR THE DISPOSAL OF INHALER MAIL-BACK PACKAGES**

To provide effective and uninterrupted “Inhaler Mail-Back Services” (as defined in Plan § III), MED-Project has identified two vendors that it may use to provide and dispose of Inhaler Mail-Back Packages. This request concerns PureWay Compliance, Inc. (“PureWay”).

The Inhaler Mail-Back Packages provided by PureWay will be pre-addressed and pre-paid for delivery to the Daniels SharpSmart, Inc. facility in Fresno, California (the “Daniels Facility”) for transport to one of two incinerators for disposal: the Covanta Huntsville, Inc. facility (the “Covanta Huntsville Facility”)<sup>1</sup> or the Covanta Marion, Inc. facility (the “Covanta Marion Facility”).<sup>2</sup> See Plan § X. The Daniels Facility will scan the unique identifier on each Inhaler Mail-Back Package to record receipt of the package before sending it for incineration to one of these two facilities. These facilities will receive and dispose of the Inhaler Mail-Back Packages and provide confirmation that the materials have been properly incinerated and disposed of.

#### **A. Covanta Huntsville Facility**

The Covanta Huntsville Facility is a permitted large municipal waste combustor. The furnaces at the Covanta Huntsville Facility are operated at temperatures exceeding 1800 degrees Fahrenheit.<sup>3</sup> As a “waste-to-energy” facility, the Covanta Huntsville Facility uses municipal solid waste, like Inhaler Mail-Back Packages, to generate steam used for the U.S. Army’s nearby Redstone Arsenal’s heating and air conditioning needs.<sup>4</sup> To control air pollution, the Covanta Huntsville Facility employs semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a nitrogen oxide control system, a mercury control system, and a continuous emissions monitoring system. Additionally, the Covanta Huntsville Facility has been designated as a Voluntary Protection Program (“VPP”) Star facility by the U.S. Occupational Safety and Health Administration (“OSHA”), recognizing the facility’s employer’s and employees’ exemplary achievement in the prevention and control of occupational safety and health hazards.<sup>5</sup>

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<sup>1</sup> Covanta Huntsville’s mailing address is 5251 Triana Blvd SW, Huntsville, AL 35805.

<sup>2</sup> Covanta Marion’s mailing address is 4850 Brooklake Road, NE, Brooks, OR 97305.

<sup>3</sup> See Solid Waste Disposal Authority of the City of Huntsville, Waste to Energy, <http://swdahsv.org/waste-to-energy/>.

<sup>4</sup> See Covanta, Covanta Huntsville, <https://www.covanta.com/Our-Facilities/Covanta-Huntsville>.

<sup>5</sup> *Id.*; U.S. Occupational Health and Safety Administration, All About VPP, [https://www.osha.gov/dcsp/vpp/all\\_about\\_vpp.html](https://www.osha.gov/dcsp/vpp/all_about_vpp.html).

## B. Covanta Marion Facility

The Covanta Marion Facility is also a permitted large municipal waste combustor. The Covanta Marion Facility is a “waste-to-energy” facility that incinerates waste and generates 13.1 megawatts per day from a condensing steam turbine generator.<sup>6</sup> Like the Covanta Huntsville Facility, the Covanta Marion Facility employs semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a nitrogen oxide control system, a mercury control system, and a continuous emissions monitoring system.<sup>7</sup> The Covanta Marion Facility is a member of the Safety and Health Achievement Recognition Program (“SHARP”), Oregon’s safety and health recognition program.<sup>8</sup> The Covanta Marion Facility has also been designated as a VPP Star facility by OSHA.<sup>9</sup>

## II. **STANDARDS FOR THE DEPARTMENT TO APPROVE THE USE OF THE PROPOSED INCINERATORS FOR THE DISPOSAL OF INHALER MAIL-BACK PACKAGES**

The Regulations allow the “Plan Liaison” (as defined in Regulations § 2) to request an “exception, exemption, or allowance from any requirement of the Ordinance or Regulations,” which the “Department shall have the discretion to grant or deny . . .” Regulations § 17. Any disposal of Mail-Back Packages must comply with the overarching Ordinance disposal requirement that “[e]ach Product Stewardship Program must comply with all local, state, and federal laws and regulations applicable to its operations, including laws and regulations governing the disposal of medical waste and Controlled Substances.” Ordinance § 6.53.060(A); *cf.* Ordinance § 6.53.120(B) (“This Chapter shall be construed so as not to conflict with applicable federal or state laws, rules or regulations.”).

## III. **THE USE OF THE PROPOSED INCINERATORS TO DISPOSE OF INHALER MAIL-BACK PACKAGES SHOULD BE APPROVED**

The Department should approve the use of the Covanta Huntsville Facility and Covanta Marion Facility for disposal of Inhaler Mail-Back Packages under Ordinance § 6.53.060(A) and Regulations § 17 because disposal at these facilities would comply with federal and state law, improve MED-Project Inhaler Mail-Back Services for residents, and protect and preserve the environment and the public health, safety, and welfare of Alameda County residents.

### A. Disposal at the Covanta Huntsville Facility and Covanta Marion Facility Complies with Federal and State Law.

There are no other laws or requirements, outside of these Regulations, that would require MED-Project to dispose of Inhaler Mail-Back Packages at a hazardous waste incinerator or medical waste incinerator or preclude MED-Project from disposing of these materials at a municipal waste combustor like the Covanta Huntsville Facility or Covanta Marion Facility. Any Inhaler Mail-Back Packages collected under this Plan are considered “household waste” excluded from regulation as medical or hazardous waste. Therefore, disposal of unwanted medicines at these facilities complies with all applicable federal and state laws, regulations, and other legal requirements. In fact, municipal waste combustors like the Covanta Huntsville Facility and Covanta Marion Facility are one of the disposal methods the United States Environmental Protection Agency directs law enforcement agencies to use for the destruction of collected pharmaceutical products. *See* United States Environmental Protection Agency, Management of Household Pharmaceuticals Collected by Law Enforcement During Take-Back Events and Programs at 2, 4 (Sept. 11, 2018).

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<sup>6</sup> *See* Covanta, Covanta Marion, <https://www.covanta.com/Our-Facilities/Covanta-Marion>.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*; U.S. Occupational Health and Safety Administration, All About VPP, [https://www.osha.gov/dcsp/vpp/all\\_about\\_vpp.html](https://www.osha.gov/dcsp/vpp/all_about_vpp.html).

B. Disposal of Inhaler Mail-Back Packages at the Covanta Huntsville Facility and Covanta Marion Facility Improves MED-Project Inhaler Mail-Back Services for Residents.

MED-Project requests approval to use the Covanta Huntsville Facility and Covanta Marion Facility to create redundancy in its Inhaler Mail-Back Services. By adding PureWay as an Inhaler Mail-Back Services vendor and the Covanta Huntsville Facility and Covanta Marion Facility as disposal facilities, MED-Project can protect against service interruptions. Should PureWay or MED-Project's other Inhaler Mail-Back Services vendor, Stericycle Specialty Waste Solutions, Inc., experience an incident requiring it to temporarily suspend services for any reason, MED-Project can continue to rely on the other vendor to provide Inhaler Mail-Back Services for Alameda County residents.

C. Disposal at the Proposed Facilities Would Protect and Preserve the Environment and the Public Health, Safety, and Welfare of Alameda County Residents.

The Covanta Huntsville Facility and the Covanta Marion Facility have extensive pollution control technologies in place, including semi-dry flue gas scrubbers injecting lime, fabric filter baghouses, a nitrogen oxide control system, a mercury control system, and a continuous emissions monitoring system. They have also been recognized for their workplace safety achievements, as evidenced by their status as VPP Star facilities. The use of these facilities would protect public health and prevent unwanted medicine from being disposed of in a manner that can adversely affect the environment in furtherance of the objectives of the Ordinance.

#### IV. CONCLUSION

Accordingly, the Department should approve the disposal of Inhaler Mail-Back Packages via incineration at the Covanta Huntsville Facility and the Covanta Marion Facility as proposed by MED-Project under Ordinance § 6.53.060(A) and Regulations § 17. Please contact the Plan Liaison, identified below, with any questions about this request.

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## Appendix K

### Stericycle, Inc., Indianapolis Facility Penalty Record

Date	Type	Summary	Violation Detail	Return to Compliance	Corrective Action
6/15/2017	RCRA	Inventory weight discrepancy	Discrepancy on the hazardous waste inventory log	6/15/2017	Violation corrected during audit, no further action required
3/29/2017	RCRA	Inventory weight discrepancy	Discrepancy on the hazardous waste inventory log	3/29/2017	Violation corrected during audit, no further action required
3/29/2017	RCRA	Hazardous waste labeling	Containers missing date	3/29/2017	Violation corrected during audit, no further action required
7/25/2016	RCRA	Inventory dates	Inventory dates and physical dates on containers did not match	10/25/2016	Responded to Indiana Department of Environmental Management ("IDEM") with corrective action plan; issue closed with Return to Compliance Letter
7/17/2015	RCRA	Hazardous waste labeling	Unlabeled universal waste pallets	11/17/2015	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter
7/17/2015	RCRA	Contingency Plan	Contingency Plan list of emergency coordinators not updated with current contact information	11/17/2015	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter



Date	Type	Summary	Violation Detail	Return to Compliance	Corrective Action
7/31/2014	RCRA	Inventory weight discrepancy	Discrepancies regarding the quantity (weight) of waste stored in permitted areas compared to the weights listed on the physical containers	9/8/2014	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter
6/5/2014	Air	Annual report not submitted	Did not submit Annual Compliance Certification for period covering 1/1/13 to 12/31/13	6/9/2014	Report submitted to IDEM; issue closed with Return to Compliance Letter
3/26/2014	RCRA	Satellite Accumulation violation	Two containers exceeded the 3-day limit for moving satellite accumulation area to the container storage area	6/17/2014	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter
3/26/2014	RCRA	Inventory weight discrepancy	Discrepancies regarding the quantity (weight) of waste stored in permitted areas compared to the weights listed on the physical containers	6/17/2014	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter
3/26/2014	RCRA	Container storage	One container of hazardous waste located outside of the permitted area	6/17/2014	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter

Date	Type	Summary	Violation Detail	Return to Compliance	Corrective Action
6/28/2013	RCRA	Satellite Accumulation/Waste Accumulation Labeling; Inventory Log discrepancy	Missing satellite accumulation and UW label; Missing Accumulation Date and Waste Type; Discrepancy on container storage locations	10/16/2013	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter

### Veolia – Port Arthur Penalty Record

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
3/9/2017	Clean Air Act (“CAA”)	Texas Commission on Environmental Quality (“TCEQ”)	<ol style="list-style-type: none"> <li>1) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour at the incinerator.</li> <li>2) Failure to maintain Carbon Monoxide emissions of 100 parts per million by volume (ppmv) at the incinerator.</li> <li>3) Failure to maintain incinerator minimum combustion temperatures.</li> <li>4) Failure to maintain Arsenic and Chromium emission rates at the Incinerator.</li> <li>5) Failure to maintain combined Cadmium-Lead and combined Arsenic-Beryllium-Chromium emissions at the Incinerator.</li> <li>6) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour during start-up at the Incinerator.</li> </ol>	<p>4/18/2017: Received NOV.</p> <p>5/27/2017: Submitted Corrective Action Plan.</p> <p>9/29/2017: Received a letter from the TCEQ stating adequate compliance documentation was received and no further action required.</p>
5/16/2016	RCRA	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to maintain hazardous waste tanks inspection records.</li> <li>2) Failure to maintain a current NOR status of INACTIVE for hazardous waste tanks inspection records.</li> <li>3) Failure to include on the emergency equipment list, One Self Contained Breathing Apparatus located at the onsite Response Office.</li> <li>4) Failure to have legible posted signs with the legend Danger-Unauthorized Personnel Keep Out.</li> <li>5) Failure to have adequate security to prevent unknowing site entry.</li> </ol>	<p>7/26/2016: Received NOV.</p> <p>8/25/2016: Submitted Corrective Action Response.</p> <p>3/1/2017: Received a letter from the TCEQ stating no further action required.</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
1/26/2016	CAA Title V/New Source Review ("NSR") Air	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour at the Incinerator.</li> <li>2) Failure to maintain Carbon Monoxide emissions of 100 ppmv at the Incinerator.</li> <li>3) Failure to maintain Incinerator minimum combustion temperatures.</li> <li>4) Failure to maintain Arsenic, Beryllium, Cadmium, Chromium and Nickel emission rates at the Incinerator.</li> <li>5) Failure to maintain combined Cadmium-Lead and combined Arsenic-Beryllium-Chromium emissions at the Incinerator.</li> <li>6) Failure to prevent visible emissions at Tank T102.</li> <li>7) Failure to make a first attempt at repair no later than 5 days after a leak is detected and failed to repair a leak no later than 15 days after a leak is detected.</li> </ol>	<p>4/27/2016: Received NOV from the TCEQ</p> <p>6/3/2016: Submitted a response to the TCEQ.</p> <p>9/20/2016: Received a letter from the TCEQ stating no further action required.</p>
4/22/2015	Texas Pollutant Discharge Elimination System ("TPDES")	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to collect ammonia-nitrogen sample at the frequency specified in the Water Quality Discharge Permit for Outfall 001.</li> <li>2) Failure to comply with test procedures specified in 30 TAC 319.11-319.12.</li> <li>3) Failure to properly calculate the daily average for E. coli.</li> <li>4) Failure to correctly report effluent data on the discharge monitoring report.</li> </ol>	<p>5/20/2015: Submitted a response to TCEQ</p> <p>6/10/2015: Received a letter from the TCEQ stating no further action is required.</p>
1/30/2015	Drinking Water	TCEQ	<ol style="list-style-type: none"> <li>1) Received NOV for failure to Provide or Report Public Notice.</li> </ol>	<p>2/20/2015: Submitted a response to TCEQ.</p> <p>12/31/2015: No further correspondence received.</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
1/16/2015	Drinking Water	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to have an accurate and up to date plant operations manual.</li> <li>2) Failure to inspect the interior of the 5,000-gallon pressure tank at least once every 5 years.</li> <li>3) Failure to notify TCEQ prior to making any significant change or addition to the system's production, treatment, storage, pressure maintenance, or distribution facilities.</li> <li>4) Failure to record the amount of chemicals used at least once a week.</li> </ol>	<p>5/29/2015: Submitted a response to TCEQ</p> <p>7/30/2015: Received a request from the TCEQ for additional information.</p> <p>11/3/2015: Submitted a response to TCEQ</p> <p>12/30/2015: Received a letter from the TCEQ stating the drinking water project was approved.</p>
1/6/2015	Air	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to maintain the Carbon Monoxide emission rate at the Incinerator for the period of April 4, 2014 through August 18, 2014.</li> </ol>	<p>3/6/2015: Submitted a response to the TCEQ.</p> <p>6/24/2015: Received a letter from TCEQ stating no further action is required.</p>
11/3/2014	Drinking Water	TCEQ	Received an NOV for failure to submit Disinfectant Level Quarterly Operating Report.	
9/26/2014	RCRA	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to document inspector's full name on daily inspection logs.</li> <li>2) Failure to include a notation of the observations made during daily &amp; weekly inspections</li> </ol>	<p>10/22/2014: Submitted Response to TCEQ.</p> <p>2/9/2015: Received documentation stating no further action is required.</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
2/20/2013	CAA	TCEQ	<ol style="list-style-type: none"> <li>1) Failure to maintain a minimum power of 15 Kilovolt Amps to the Wet Electrostatic Precipitator (EPN INCINSTK).</li> <li>2) Failure to conduct the 4th quarter Cylinder Gas Audits on the Hydrogen Chloride and Sulfur Dioxide CWMS.</li> <li>3) Failure to maintain carbon monoxide emission rate at the Incinerator (EPN INCINSTK).</li> </ol>	<p>5/24/2013: Submitted Response to TCEQ for Alleged Violations 1. and 2.</p> <p>6/21/2013: Received letter from the TCEQ stating no further action is required for Alleged Violations 1. and 2.</p> <p>5/2/2013: Received Notice of Enforcement for Alleged Violation 3.</p> <p>9/12/2013: Received Revised Proposed Agreed Order Assessing Penalty</p> <p>9/16/2013: Submitted Payment of Penalty</p> <p>2/20/2014: Received Final Agreed Order</p> <p>3/25/2014: Submitted written certification and documents to demonstrate compliance.</p> <p>8/22/2014: Received Notice of Compliance with Agreed Order</p>

### Heritage Thermal Services – Ohio Penalty Record

Type of Action	Date	Address	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
Notice of violation ("NOV")	5/26/17		Division of Air Pollution Control ("DAPC")	Heritage Thermal Services ("HTS") exceeded total hydrocarbons 1-hr rolling average on March 25, 2017 (Title V).	NA	<b>Closed</b> – Ohio EPA ("OEPA") issued resolution of violation letter on 7/11/17.
NOV	2/12/16		OSHA	Failure to ensure employee was wearing proper personal protective equipment ("PPE").	\$27,720	<b>Closed</b> – HTS settled this matter on October 14, 2016.
NOV	1/21/16		DAPC	HTS exceeded NOx 3hr block average on June 28, 2015 (Title V).	NA	<b>Closed</b> - NOV resolved in letter dated 02/25/16; HTS responded with action plan in a letter dated February 5, 2016.
Director's Final Findings & Orders	4/2/2015	1250 Saint George Street East Liverpool, Ohio, 43920	OEPA, DAPC and Ohio Division of Materials and Waste Management ("DMWM")	NOVs issued to HTS due to the 7/13/13 Incident:  Dust Nuisance (DAPC)  Unlawful disposal of hazardous waste and improper maintenance and operation of equipment (DMWM)	\$34,000	HTS is in discussions with OEPA
Finding of Violation	3/25/2015	1250 Saint George Street East Liverpool, Ohio, 43920	US EPA	HTS exceeded Maximum Achievable Control Technology standard and Title V Operating Parameter Limits on several occasions.	TBD	HTS is in discussions with US EPA

Type of Action	Date	Address	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
NOV	9/16/2014	1250 Saint George Street  East Liverpool, Ohio, 43920	DMWM	Violation of Ohio Administrative Code ("OAC") 3745-55-75(b)  Bulk waste container stored outside of secondary containment.	NA	<b>Closed</b> – Return to compliance ("RTC") received in a letter dated December 8, 2014. September 16, 2014 letter acknowledged that issue had been corrected on date of inspection.
NOV	9/16/2014	1250 Saint George Street  East Liverpool, Ohio, 43920	DMWM	Violation of OAC 3745-54-15(c)  Immediate action had not been taken to prevent further incident following discovery of equipment damage.	NA	<b>Closed</b> – RTC received in a letter dated December 8, 2014. September 16, 2014 letter acknowledged that issue had been corrected on date of inspection.
NOV	9/16/2014	1250 Saint George Street  East Liverpool, Ohio, 43920	DMWM	Violation of Permit Condition C.6(c)  Spills not cleaned up in a timely manner.	NA	<b>Closed</b> – RTC received in a letter dated December 8, 2014. September 16, 2014 letter acknowledged that issue had been corrected on date of inspection.



Type of Action	Date	Address	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
NOV	10/2/2013	1250 Saint George Street  East Liverpool, Ohio, 43920	DMWM	Ash release on 7/13/13 was an unlawful Disposal of Hazardous Waste.  Failure of proper Operation and Maintenance of equipment/facility	NA	HTS responded in a letter dated October 21, 2013.  HTS met with OEPA on 9/22/14 to provide update.  HTS provided written update and request for RTC in letter dated 10/17/14.  HTS 2 <sup>nd</sup> request for RTC in letter dated 12/12/14.  HTS 3 <sup>rd</sup> request for RTC in letter dated 2/3/2015.  HTS has completed requirements for RTC and is actively pushing OEPA for RTC.

Type of Action	Date	Address	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
NOV	8/5/13	1250 Saint George Street  East Liverpool, Ohio, 43920	DAPC	Ash release determined to be a public nuisance in violation of OAC 3745-15-07	NA	HTS responded in a letter dated August 22, 2013.  HTS met with OEPA on 9/22/14 to provide update.  HTS provided written update and request for RTC in letter dated 10/17/14.  HTS 2 <sup>nd</sup> request for RTC in letter dated 12/12/14.  HTS 3 <sup>rd</sup> request for RTC in letter dated 2/3/2015.  HTS has completed requirements of RTC and is actively pushing OEPA for RTC.
NOV	6/21/2013	1250 Saint George Street  East Liverpool, Ohio, 43920	OSHA	Violation of various standards – decontamination, improper storage of water reactives, not identifying hazards.	\$11,802	<b>Closed</b> – HTS settled this matter on 8/30/13.  HTS and OSHA met for informal conference on 7/16/13.  Agreement reached. Penalty reduced to \$11,802.

## Clean Harbors Aragonite Enforcement Summary Fact Sheet

Clean Harbors Aragonite is subject to regulatory inspections by multiple agencies. While our goal is 100% compliance with all permits and regulatory requirements, inspections can result in alleged violations. This document is a summary from those inspections.

Although the company does not necessarily concur with these findings, consistent with the company's standard policy it has agreed to take all steps necessary to comply with the orders and to take such other corrective measures so as to ensure that the facility is in full compliance with its federal and state operating permits.

In 2015 the facility resolved a notice of violation with USDEA. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. Failure to maintain a current license required by the state of Utah. ***A former compliance manager did not renew one of two state licenses. This was discovered during an internal audit and self-reported to both Utah and DEA. The facility voluntarily discontinued acceptance of controlled substances until the permit was obtained.***
2. Failure to maintain separate biennial reports for Schedule I/II and III/IV/V controlled substances. ***The facility had zero inventory and reported that on one form. We disagreed with this allegation. If there was any inventory to report it would have been done on separate forms as required by the regulations.***
3. Failure to maintain complete and accurate records. ***Information was contained on Form 41's as required by regulation but would not fit in the column DEA considered appropriate. The facility began to use revised DEA form 41's (that includes more space) to address the issue.***

This was resolved by a consent order that included a \$63,000 penalty.

In 2015 the facility resolved a notice of violation with Utah Board of Pharmacy for the same issue as #1 above.

This was resolved by an administrative order that included a \$20,000 penalty.

In 2014 the facility resolved a notice of violation with USDEA. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. Failure to complete an accurate biennial inventory. ***The facility had zero inventory and reported that on a Clean Harbors letterhead. We disagreed with this violation. If there was any inventory to report it would have been done on forms as required by the regulations.***
2. Failure to document the number of items received and the date items were received on a copy 3 of DEA form 222. ***This information was documented on a transfer form but not copied to a form 222. Facility personnel were retrained to address the issue.***
3. Failure to execute a form 222 to transfer substances to another registered entity. A shipment count did not match and was rejected back to the generator. ***The facility did not include rejection using a form 222. Facility personnel were retrained to address the issue.***
4. Failure to report the required documents in ARCOS in a complete and accurate manner. ***We disagreed with this violation. All reports were submitted to ARCOS. There were several errors not yet corrected at the time of the inspection. All errors were subsequently corrected.***

This was resolved by a consent order that included a \$190,000 penalty.

In 2013 the facility resolved a notice of violation with UDEQ. This pertains to an annual RCRA inspection conducted in 2012. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. The facility self-reported a permit condition to record times each backup carbon adsorber is used was not followed. ***During an internal audit it was discovered a PLC that records backup carbon usage was rounding minutes incorrectly and slightly underreported usage. The programming was corrected.***
2. The facility self-reported that a water reactive labpack in excess of four liters was accepted and incinerated, in violation of permit conditions. ***The material is acceptable but not in excess of four liters per container. The person responsible for the mistake was disciplined.***
3. UDEQ alleged that weekly emergency shower and eyewash inspections were not noted in inspection tags. ***We disagreed with this violation. Inspections were performed and documented on an inspection log.***
4. UDEQ alleged that a leaking roof repair was not completed within 72 hours as required by permit. ***We disagreed with this violation. During a January storm, ice accumulated on a roof over Building E-2. Once it warmed above freezing a small leak was discovered. Due to the dangers of roofing contractors on frozen roofs, this was not repaired until May***
5. UDEQ alleged the facility did not report a fire as required by the permit. ***We disagreed with this violation. Heat tracing under pipe insulation shorted arced and melted wire insulation. There was not a fire and as such was not reportable.***
6. UDEQ alleged that a RCRA air subpart BB/CC database and associated drawings were not kept updated. ***The database was accurate but drawings were not current.***
7. UDEA alleged that an incoming container tested positive for oxidizers and that container should have been reclassified as a DOT oxidizer. ***We disagreed with this violation. The container held mixed acids, some of which do test positive for oxidizers. This was not an oxidizer per DOT standards.***
8. The facility self-reported that an inbound trailer was not offloaded within 10 days as required by permit. ***No comment. This was self-reported.***

This was resolved by a consent order that included a \$31,155 penalty.

In 2012 the facility resolved a notice of violation with UDEQ. This pertains to an annual RCRA inspection conducted in 2011. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. UDEQ alleged there was a calibration problem with the oxygen analyzer in the hydrocarbon vent system. ***We disagreed with this violation. The facility inspection program found and corrected the problem prior to the inspection. This was corrected by installing a condensation trap and filter prior to the analyzer.***
2. The facility self-reported to UDEQ that the direct burn flow meter was incorrectly calibrated. ***This was immediately corrected when discovered.***
3. UDEQ alleged the facility did not properly describe a waste being accepted on the waste receiving report. ***We disagreed with this violation. The waste was profiled with a range (IE: yellow liquid 0-25%) so the waste received description can seem subjective compared to the profile.***
4. UDEQ alleged 2 drums of site generated waste were incinerated without burn chemistry documentation. ***The facility believes this was done but documentation could not be produced. Personnel involved were retrained.***
5. There were seven additional examples of improper burn chemistry documentation violations. ***To address the issues, the waste analysis plan was recently modified that will allow burn chemistry***

*matrixes to be applied based on sampling and analysis of each waste stream. This information is documented in the operating record.*

6. UDEQ alleged the facility did not properly completed inspection logs. *During this timeframe, a new electronic inspection log was implemented. One day the log would indicate an issue and the next day it passed. The problem was attributed to a pop up warning that did not properly function. This was promptly corrected.*
7. UDEQ alleged that crack repairs to a secondary containment system was a violation. *We disagreed with this violation. The cracks were found during an inspection. They could not be repaired within 72 hours as required by permit due to weather. UDEQ was notified prior to 72 hours as required by the permit. The cracks were promptly repaired when the weather was dry and >50°F. (needed for the epoxy to cure)*
8. UDEQ alleged the facility did not report a fire as required by the permit. *We disagreed with this violation. A hose connected to a propane torch became disconnect causing an incidental fire. The permit requires any fire in an area where waste is managed to be reported. The fire did not meet reporting required by the permit.*
9. UDEQ alleged an instrument calibration log was not signed by the technician who did the calibration. *The person did not sign the log as required. He was retrained.*

This was resolved by a consent order that included a \$35,017 penalty.

In 2012 EPA issued a warning letter alleging seven instances of TRI reporting errors from 2007 through 2010. *These mistakes were made by a former employee who is no longer employed by Clean Harbors.*

This was resolved by a consent order that included a \$39,900 penalty.

Questions associated with this fact sheet should be directed to Mike Crisenbery, VP Compliance (513-823-2280).

### Curtis Bay Energy LP Penalty Record

Date	Type	Summary	Detail	Fine Amount	Return to Compliance Date	Corrective Action
<b>March 2015</b>	Air	HCl Emissions failure was caused by incomplete Trona injection, CO Emissions failure was caused by incomplete combustion of the waste, and Opacity Emission. Failure was caused by bag malfunction	Hydrogen Chloride (HCl), Carbon Monoxide (CO), and opacity limit exceedance	fine amount \$125,000, settlement \$50,000	January 2016	<ul style="list-style-type: none"> <li>i. HCl Emissions failure was addressed Installation of a DSI (Dry Sorbent Injection System)</li> <li>ii. CO failure was addressed by implementing better engineering practices and installing a new conveyor system for providing enhanced blended for better emissions control.</li> <li>iii. Opacity Emissions Failure was corrected with ongoing preventive maintenance of the bags.</li> </ul>

### Daniels Sharpsmart, Inc. Fresno, California Transfer Facility Penalty Record

Date	Address	Regulatory Body/Agency	Finding
5/28/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Failed to provide tracking documents which show the name, address, and telephone number of the medical waste generator, for purpose of tracking the generator medical waste when the waste is transported to the final medical waste treatment facility.
5/28/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.
5/28/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Tracking documents are not staying with the waste and are being signed off as treated by the office staff.
5/28/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Unregistered haulers are used to transport waste out of the state for incineration.
8/26/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Waste is not being held at 32°F or below.

Date	Address	Regulatory Body/Agency	Finding
8/26/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.
8/26/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	The facility shall immediately clean the ground around the treatment area to a well-maintained condition. Any enclosure or designated accumulation area used for storage of medical waste prior to transportation or treatment shall provide medical waste protection from animals and natural elements and shall not provide a breeding place for insects or rodents.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Failed to provide tracking documents which show the name, address, and telephone number of the medical waste generator, for purpose of tracking the generator medical waste when the waste is transported to the final medical waste treatment facility.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Waste is not being treated within the required timeframe.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.



Date	Address	Regulatory Body/Agency	Finding
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	A new operations manual must be submitted within 30 days.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Tracking documents are not staying with the waste and are being signed off as treated by the office staff.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Unregistered haulers are used to transport waste out of the state for incineration.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Not all incineration waste is being treated by incineration.
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Not all pathology waste is being treated in a mixture of 25% pathology and 75% biohazardous waste as required.

Date	Address	Regulatory Body/Agency	Finding
11/20/2014	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Non-compliances with the conditions of the permit were not reported to the Department within 24 hours.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Failed to provide tracking documents which show the name, address, and telephone number of the medical waste generator, for purpose of tracking the generator medical waste when the waste is transported to the final medical waste treatment facility.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Waste is not being treated within the required timeframe.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Waste is not being held at 32°F or below.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.

Date	Address	Regulatory Body/Agency	Finding
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Some waste containers are being compromised and pose an environmental risk.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Some pharmaceutical waste containers, individual, secondary or the fiberboard boxes did not have the proper labeling.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Autoclavable waste in the recycled sharps program was not treated within the required seven days.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Tracking documents are not staying with the waste and are being signed off as treated by the office staff.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Not all incineration waste is being treated by incineration.

Date	Address	Regulatory Body/Agency	Finding
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Not all pathology waste is being treated in a mixture of 25% pathology and 75% biohazardous waste as required.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Did not request both the shipping and tracking documents from the transporters delivering waste to the transfer station.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Tracking documents do not meet the requirements of the Code of Federal Regulations (CFR) for the DOT shipping documents.
4/10/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	The findings by the Department on November 20, 2014 that the autoclave computer was not consistently printing the time/temperature readings have not been corrected.
5/20/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Some pharmaceutical waste containers, individual, secondary or the fiberboard boxes did not have the proper labeling.

Date	Address	Regulatory Body/Agency	Finding
5/20/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Develop a process for ensuring that all documents are completely and accurately filled out and that it is clear where the waste is being transferred for out of state treatment.
5/20/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Did not request both the shipping and tracking documents from the transporters delivering waste to the transfer station.
5/20/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Tracking documents do not meet the requirements of the Code of Federal Regulations (CFR) for the DOT shipping documents.
5/20/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	The findings by the Department on November 20, 2014 that the autoclave computer was not consistently printing the time/temperature readings have not been corrected.
11/2/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	A few sharpsmart transport carts were missing from the facility.

Date	Address	Regulatory Body/Agency	Finding
11/2/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Sanitec totes used to store and transport pathology waste to Healthwise for treatment were not labeled nor had tight fitting lids.
11/2/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Tracking documents are not staying with the waste and pharmaceutical containers were not secure.
11/2/2015	4144 Therese Ave Fresno, CA 93725	California Department of Public Health	Develop a process to ensure that documentation is as accurate as possible.

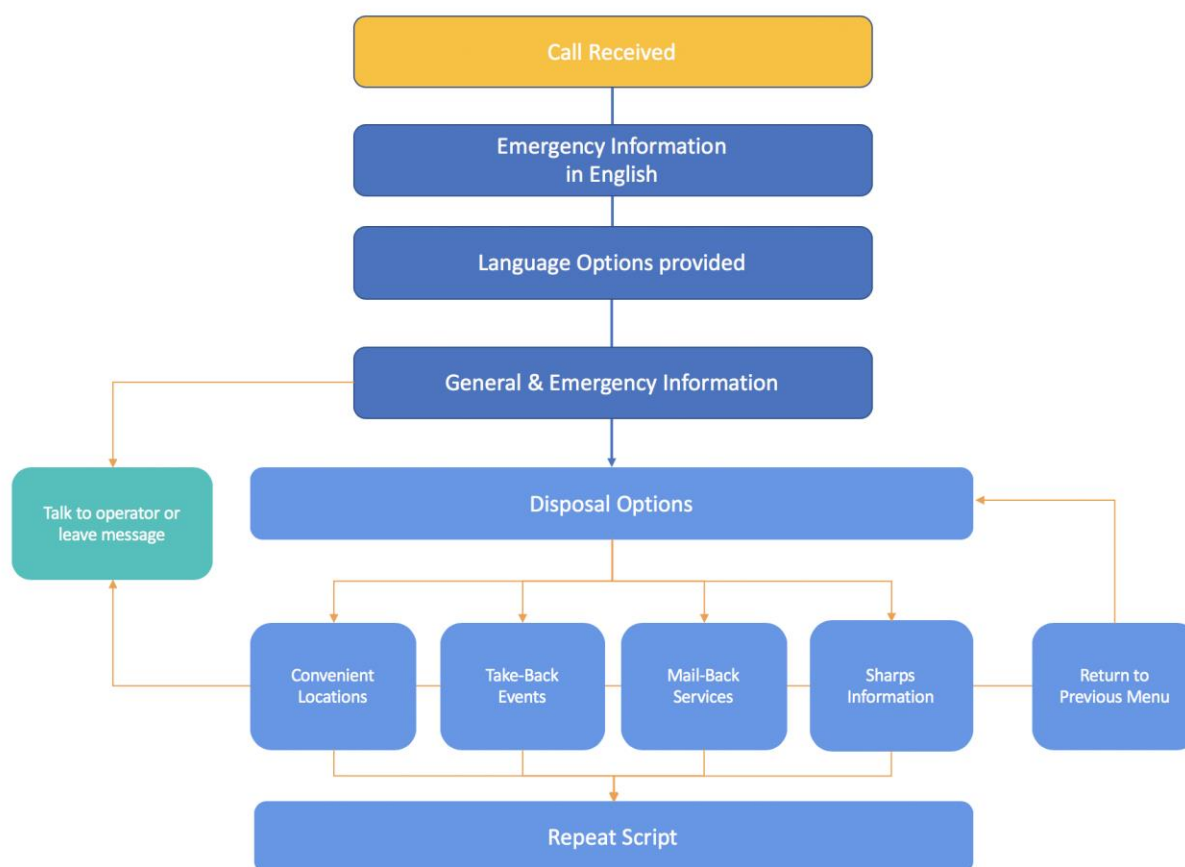
## Appendix L

### Education and Outreach Call Center Script

# MED-Project™

Medication Education & Disposal

Thank you for calling the information line for the Medication Education and Disposal Project, or MED-Project.



#### Call Script:

- If you are experiencing a medical emergency, please hang up and dial 9-1-1.
- If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Poison Control at 800-222-1222.
- Unwanted Medicine Kiosks are located throughout your local area and provide convenient options for disposing of expired or Unwanted Medicines. Press 3 for more information about convenient kiosks.
- Mail-Back Services are available to Residents. Press 4 for more information.
- Take-Back Events may be scheduled throughout the year and offer residents a free and convenient way to dispose of expired or Unwanted Medicine. Press 5 for more information.

- A Sharps Program is available in your local area and provides convenient options for disposing of unwanted sharps. Press 6 for more information.
- You may press 0 at any time to speak with an operator about disposal options.
- MED-Project is a consumer education campaign dedicated to proper medication use and consumer disposal.
- MED-Project reminds you that taking your medicine as directed by your health care provider is important to your health.
- If you have questions about your medication, please hang up and call your health care provider.
- For additional questions about the proper disposal of expired or unwanted medications from households, please go to [www.med-project.org](http://www.med-project.org) or press 0 to talk to an operator.
- To hear this menu again, please press 1.
- *Thank you for calling MED-Project.*

**Unwanted Medicine Kiosk Script for when Option 3 is selected:**

- Kiosk Drop-Off Sites for Unwanted Medicine are located conveniently throughout your local area. To locate the site nearest you, or for precise information about hours of operation, press 0 to speak with an operator or visit [www.med-project.org](http://www.med-project.org) to search by your zip code.
- Kiosks accept medications in any dosage form in their original container or sealed bag. Items that are not accepted include herbal remedies, vitamins, supplements, cosmetics or other personal care products; medical devices; batteries; mercury-containing thermometers; sharps; and illicit drugs.
- If you transfer your medications to a sealed bag before placing it into a kiosk, please be sure to recycle all remaining packaging.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
- To repeat this information, press 3.
- To return to the main menu, please press 1.
- *Thank you for calling MED-Project.*

**Unwanted Medicine Mail-Back Services Script for when Option 4 is selected:**

- Mail-Back Services for unwanted medicine and inhalers are available to disabled and home-bound Residents, persons providing services to such Residents, and Residents in underserved areas of the County.
- Unwanted Medicine Mail-Back Packages accept medications in any dosage form in their original container or sealed bag. Items that are not accepted include herbal remedies, vitamins, supplements, cosmetics or other personal care products; medical devices; batteries; mercury-containing thermometers; sharps; and illicit drugs.
- To request a Mail-Back Package, please press 0 to talk to the operator or visit [www.med-project.org](http://www.med-project.org).
- If you transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
- To repeat this information, press 4.
- To return to the main menu, please press 1.
- *Thank you for calling MED-Project.*



#### Unwanted Medicine Take-Back Event Script for when Option 5 is selected:

- MED-Project may be working with local law enforcement and other community organizations to offer regular expired and Unwanted Medicine Take-Back Events in your area. For a complete list of Take-Back Events, please press 0 to speak to the operator or visit [www.med-project.org](http://www.med-project.org).
- Take-Back Events accept medications in any dosage form in their original container or sealed bag. Items that are not accepted include herbal remedies, vitamins, supplements, cosmetics or other personal care products; medical devices; batteries; mercury-containing thermometers; sharps; and illicit drugs.
- If you transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
- To repeat this information, press 5.
- To return to the main menu, please press 1.
- *Thank you for calling MED-Project.*

#### Sharps Program Script for when Option 6 is selected:

- Kiosks to collect unwanted sharps are located throughout your local area. To locate the kiosk site nearest you, or for information about kiosk locations, press 0 to speak with an operator, or visit [MED-Project.org](http://MED-Project.org) to search by zip code.
- Sharps Mail-Back Services<sup>1</sup> for sharps are available to disabled and home-bound Residents or to persons providing services to such Residents. To request a Sharps Mail-Back Package, press 0 to talk to the operator or visit [MED-Project.org](http://MED-Project.org).
- Sharps such as hypodermic needles, pen needles, intravenous needles, pre-loaded sharps, auto injectors, intravenous needles, lancets and other devices used to penetrate the skin for drawing blood, or for the delivery of medications or drugs contained in approved sharps containers may be turned in at kiosks or placed in a Sharps Mail-Back Package.
- MED-Project cannot accept controlled substances, shaving razors, loose needles, unwanted medicine not contained in sharps, or loose sharps that are not contained in approved sharps containers. Approved sharps containers must be made of a heavy-duty plastic; able to close with a tight-fitting, puncture-resistant lid, without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as “sharps waste” or with the biohazard symbol and the word “BIOHAZARD”.
- MED-Project is working with community organizations to offer Sharps take-back events in your area. For a complete list of take-back events, please press 0 to speak to the operator or visit [MED-Project.org](http://MED-Project.org).
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications.
- To repeat this information, press 6.
- To return to the main menu, press 1.
- *Thank you for calling MED-Project.*

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<sup>1</sup> **Sharps Mail-Back Services** is the provision of pre-paid, pre-addressed packages to disabled and home-bound Residents for the collection and disposal of Sharps (“**Sharps Mail-Back Packages**”) by Vendor. **Sharps** as defined in Section 6.54.030 of the Alameda County Safe Consumer-Generated Sharps Disposal Ordinance, Alameda County Code Chapter 6.54 are “devices with sharp points or edges that can cut or puncture the skin and includes needles, pen needles, syringes, lancets, auto-injectors, infusion sets, intravenous catheters, connection needles/sets, and other devices.”

## Appendix M

### MED-Project Website

**MED-Project™**  
Medication Education & Disposal

MEDhome

MEDinfo

MEDfaq

Contact

### ALAMEDA COUNTY, CA

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider. However, if you have expired or unwanted **Medicines** or used **Sharps**, proper disposal is important and easy.

查看本页面〈中文〉

Ver esta página en español

Tingnan ang page na ito sa Tagalog

Xem trang này bằng tiếng việt



  
CHECK THE PACKAGE

  
CONVENIENT LOCATIONS

  
MAIL BACK

  
TAKE-BACK EVENTS

  
IN-HOME DISPOSAL

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

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## CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package, or package insert, please follow those instructions. Do not flush any medication down the toilet unless the information on the label, package or package insert specifically instructs you to do so.

Never place Sharps in the trash or recycling, and never flush them down the toilet. Disposing of Sharps in the trash or recycling may put trash and sewage workers, janitors, housekeepers, household members, and children at risk of being harmed.

To protect your privacy, consumers are reminded to remove all personally identifiable information on medication labels or packaging before disposing of Unwanted Medicines.

(Source U.S. Food and Drug Administration)



CHECK THE  
PACKAGE



CONVENIENT  
LOCATIONS



MAIL  
BACK



TAKE-BACK  
EVENTS



IN-HOME  
DISPOSAL

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## CONVENIENT LOCATIONS

Community kiosk drop-off sites allow Residents to bring expired or Unwanted Medicines and Sharps to a convenient location for proper disposal.

### UNWANTED MEDICINE:

**ACCEPTED:** MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*

**NOT ACCEPTED:** HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT DRUGS.\*\*

**\*\* Please dispose of any items on the NOT ACCEPTED list at your local Hazardous Waste Facility. Call (800) 606-6606 or visit [Household-HazWaste.org](http://Household-HazWaste.org) for details.**

### SHARPS:

**ACCEPTED:** SHARPS (SUCH AS HYPODERMIC NEEDLES, PEN NEEDLES, PRE-LOADED SHARPS, AUTO-INJECTORS, INTRAVENOUS NEEDLES, LANCETS AND OTHER DEVICES USED TO PENETRATE THE SKIN FOR DRAWING BLOOD, OR FOR THE DELIVERY OF MEDICATIONS) CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.\*\*\*

**NOT ACCEPTED:** CONTROLLED SUBSTANCES, UNWANTED MEDICINE NOT CONTAINED IN SHARPS, AND LOOSE SHARPS THAT ARE NOT CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.

**\*\*\*Approved sharps containers should be:** made of a heavy-duty plastic; able to close with a tight-fitting, puncture-resistant lid, without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as "sharps waste" or with the biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.

To find the nearest disposal locations for Unwanted Medicines and Sharps, enter your zip code below.

Starting Point Radius  
 5 miles SEARCH

Refine your results:

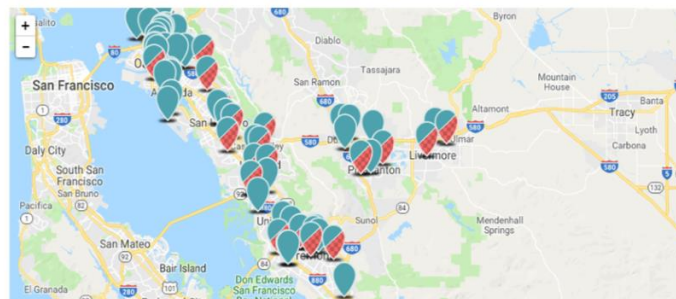


Unwanted Medicine Kiosks



Sharps Kiosks

RESET



CHECK THE PACKAGE



CONVENIENT LOCATIONS



MAIL BACK



TAKE-BACK EVENTS



IN-HOME DISPOSAL

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## MAIL-BACK

### UNWANTED MEDICINES MAIL-BACK SERVICES:

Mail-Back Services for Unwanted Medicines are available to home bound and under-served Residents upon request. Medications in any dosage form in their original container or sealed bag are accepted. Each Unwanted Medicine Mail-Back Envelope is 8" by 11" inches in size and will hold up to 8 ounces of Unwanted Medicine.\*

\* If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

**Note:** The following items are not accepted in Unwanted Medicine Mail-Back Envelopes: Herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, inhalers, sharps, and illicit drugs.\*\*

\*\* Please dispose of any items on the NOT ACCEPTED list at your local Hazardous Waste Facility. Call (800) 606-6606 or visit [Household-HazWaste.org](http://Household-HazWaste.org) for details.

### INHALER MAIL-BACK SERVICES:

Mail-Back Services for Inhalers are available to home bound and under-served Residents upon request. Each inhaler Mail-Back Package size ranges from 8oz to 2.5 gallons.

**Note:** Only place undamaged inhalers in their original containers in the Inhaler Mail-Back Package. Inhaler Mail-Back Package can only be used for inhalers and cannot accept other types of items.

### SHARPS MAIL-BACK SERVICES:

Sharps Mail-Back Services are available for differentially-abled or home-bound residents and persons providing services to such Residents upon request. Sharps (such as hypodermic needles, pen needles, pre-loaded sharps, auto-injectors, intravenous needles, lancets and other devices used to penetrate the skin for drawing blood or for the delivery of medications) contained in U.S. Food and Drug Administration-cleared sharps containers.\*\*\*

**Note:** The following items are not accepted in Sharps Mail-Back Packages: Controlled substances, unwanted medicine not contained in sharps, and loose sharps that are not contained in U.S. Food and Drug Administration-cleared sharps containers.

\*\*\*All sharps disposal containers should be made of heavy-duty plastic; able to close with a tight-fitting, puncture resistant lid without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as "sharps waste" or with the biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.

Please complete the below form to request a pre-paid, pre-addressed mail-back package. Instructions for disposal will be provided with all mail-back services. This form may be submitted more than once if multiple packages are needed.

Select your Package type\*

#### Contact Information

First Name\*

Last Name\*

Email

Address\*

Address 2

City\*

California

Zip Code\*

SUBMIT REQUEST



CHECK THE  
PACKAGE



CONVENIENT  
LOCATIONS



MAIL  
BACK



TAKE-BACK  
EVENTS



IN-HOME  
DISPOSAL

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.



## TAKE-BACK EVENTS

Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines and sharps. The local authorities and MED-Project may also sponsor local drug take-back days in your area.

### UNWANTED MEDICINE:

**ACCEPTED:** MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*

**NOT ACCEPTED:** HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT DRUGS.\*\*

*\*\* Please dispose of any items on the NOT ACCEPTED list at your local Hazardous Waste Facility. Call (800) 606-6606 or visit [Household-HazWaste.org](http://Household-HazWaste.org) for details.*

### SHARPS:

**ACCEPTED:** SHARPS (SUCH AS HYPODERMIC NEEDLES, PEN NEEDLES, PRE-LOADED SHARPS, AUTO-INJECTORS, INTRAVENOUS NEEDLES, LANCETS AND OTHER DEVICES USED TO PENETRATE THE SKIN FOR DRAWING BLOOD, OR FOR THE DELIVERY OF MEDICATIONS) CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.\*\*\*

**NOT ACCEPTED:** CONTROLLED SUBSTANCES, UNWANTED MEDICINE NOT CONTAINED IN SHARPS, AND LOOSE SHARPS THAT ARE NOT CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.

*\*\*\*Approved sharps containers should be: made of a heavy-duty plastic; able to close with a tight-fitting, puncture-resistant lid, without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as "sharps waste" or with the biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.*



CHECK THE  
PACKAGE



CONVENIENT  
LOCATIONS



MAIL  
BACK



TAKE-BACK  
EVENTS



IN-HOME  
DISPOSAL

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## IN-HOME DISPOSAL

If no disposal instructions are given on the drug labeling and no Take-Back Program is available in your area, throw the drugs in the household trash following these steps:

1. Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs).
2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.

**Never place sharps in the trash or recycling and never flush them down the toilet.** Disposing of sharps in the trash or recycling may put trash and sewage workers, janitors, housekeepers, household members, and children at risk of being harmed.

Source: U.S. Food and Drug Administration



CHECK THE  
PACKAGE



CONVENIENT  
LOCATIONS



MAIL  
BACK



TAKE-BACK  
EVENTS



IN-HOME  
DISPOSAL

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## MEDInfo

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications and sharps securely to prevent accidental ingestion or misuse by others in your household, especially children.

There are a number of ways to dispose of expired or Unwanted Medicines and Sharps. To protect your privacy, consumers are reminded to remove all personally identifiable information on medication labels or packaging before disposing of Unwanted Medicines.

For additional information on the program, MED-Project has developed an educational toolkit, including:

Unwanted Medicines Brochure:

[English](#) [中文](#) [Español](#) [Tagalog](#) [Tiếng Việt](#)

Sharps Brochure:

[English](#) [中文](#) [Español](#) [Tagalog](#) [Tiếng Việt](#)

Frequently Asked Questions:

[English](#) [中文](#) [Español](#) [Tagalog](#) [Tiếng Việt](#)

Radio Public Service Announcement (PSA) – Unwanted Medicines:

[PLAY](#)

Radio Public Service Announcement (PSA) – Sharps:

[PLAY](#)

Video Public Service Announcement (PSA) – Unwanted Medicines:

[PLAY](#)

Video Public Service Announcement (PSA) – Sharps:























[PLAY](#)

If you would like any of the Unwanted Medicine Program materials emailed to you, contact [alamedacounty@med-project.org](mailto:alamedacounty@med-project.org).  
If you would like any of the Sharps Program materials emailed to you, contact [alamedacountysharps@med-project.org](mailto:alamedacountysharps@med-project.org).

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## MEDfaq

-  What is the MED-Project?
-  What should I do if I am having a medical emergency?
-  What should I do if I think I have ingested something poisonous?
-  What should I do if I think I or someone in my household has been stuck by a used sharp?
-  Whom should I call with a question about my medication or sharps?
-  Where can I find information about the safe storage of medication or sharps?
-  Where can I find information about California's Prop 65?
-  Can I flush my medication or sharps down the toilet?
-  Should I remove my personal information before disposing of my medication or sharps?
-  Where are the MED-Project disposal locations nearest me?
-  Will it cost me anything to dispose of my expired or unwanted medications or sharps?
-  What items can I dispose of in MED-Project kiosks?
-  Will there be any take-back events in my area?
-  Where else can I find information about the safe disposal of expired or unwanted medicines?
-  Where else can I find information about the safe disposal of sharps?
-  I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?
-  What is recommended for safe disposal of expired or unwanted medicine in Alameda County?
-  Where can I find more information on the Alameda County Safe Drug Disposal Ordinance?
-  查看本页 (中文)
-  Ver esta página en español
-  Tingnan ang page na ito sa Tagalog
-  Xem trang này bằng tiếng việt

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## CONTACT

If you are experiencing a medical emergency, please dial 911.  
If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Poison Control at 1 (800)-222-1222. If you have questions about your medication, please dial your health care provider.

For answers to some frequently asked questions about MED-Project, [click here](#).

### Residents

If you are a resident of Alameda County and have questions about MED-Project, please contact:

1 844 MED-PROJECT or 1 (844) 633-7765

### Pharmacies and Law Enforcement Offices

If you are a current kiosk drop-off host site, or a retail pharmacy, hospital/clinic pharmacy or law enforcement agency interested in hosting a drop-box, contact:

Dr. Victoria Travis, PharmD, MS, MBA  
National Program Director  
MED-Project LLC  
Phone: 1 (844) 677-6532  
Fax: 1 (510) 686-8837

Email Inquiries for:  
Unwanted Medicine Disposal: [alamedacounty@med-project.org](mailto:alamedacounty@med-project.org)  
Sharps Disposal: [alamedacountysharps@med-project.org](mailto:alamedacountysharps@med-project.org)

### Drug Producers:

If you are a drug producer interested in participating in a MED-Project stewardship plan, contact:

Phone: 1 (202) 495-3131  
Email: [compliance@med-project.org](mailto:compliance@med-project.org)

### Sharps Producers:

If you are a sharps producer interested in participating in a MED-Project stewardship plan, contact:

Phone: 1 (202) 495-3131  
Email: [compliance@med-project.org](mailto:compliance@med-project.org)

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# Appendix N

## Brochure

### WHAT SHOULD YOU DO WITH YOUR UNWANTED OR EXPIRED MEDICINES?

**MED-Project**<sup>TM</sup>  
Medication Education & Disposal

### SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES

*There are a number of ways to dispose of expired or unwanted medicines.*

For more information about the MED-Project program, go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-PROJECT

What should you do with your expired or unwanted medicines?



Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicine as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent accidental ingestion or misuse by others in your household, especially children.

If you have expired or unwanted medication, proper disposal is easy. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the following disposal options.

(Source: U.S. Food and Drug Administration)



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*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*

**MED-Project**<sup>TM</sup>  
Medication Education & Disposal  
[www.med-project.org](http://www.med-project.org)

## DISPOSAL OPTIONS

### 1 CHECK THE PACKAGE



If there are any specific instructions for disposal on the label, please follow those instructions. Do not flush any medication down the toilet unless the information on the label, package or package insert specifically instructs you to do so.

### 2 CONVENIENT LOCATIONS



To find the drop-off sites in your area, visit the Convenient Locations section of [www.med-project.org](http://www.med-project.org).

### 3 MAIL-BACK



Mail-Back Services for Unwanted Medicines and Inhalers are available to home bound and under-served Residents upon request. Visit the Mail-back section of [www.med-project.org](http://www.med-project.org) to order a Mail-Back Package.

## What items can I dispose of at a kiosk?



**ACCEPTED:**  
MEDICATIONS IN ANY DOSAGE FORM,  
EXCEPT FOR THOSE LISTED BELOW,  
IN THEIR ORIGINAL CONTAINER OR  
SEALED BAG.

*If transferring medications to a sealed bag, please  
be sure to recycle all remaining packaging.*



**NOT ACCEPTED:**  
HERBAL REMEDIES, VITAMINS,  
SUPPLEMENTS, COSMETICS, OTHER  
PERSONAL CARE PRODUCTS, MEDICAL  
DEVICES, BATTERIES, MERCURY-CONTAINING  
THERMOMETERS, SHARPS, AND ILLICIT DRUGS.

*Please dispose of any items on the NOT ACCEPTED list at  
your local Hazardous Waste Facility. Call (800) 606-6606 or  
visit [Household-HazWaste.org](http://Household-HazWaste.org) for details.*

## DISPOSAL OPTIONS

### 4 TAKE-BACK EVENTS



Local Take-Back Events offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Visit the Take-Back Events section of [www.med-project.org](http://www.med-project.org) for more information on events in your area.

### 5 IN-HOME DISPOSAL



1. Remove medication from its original container and mix with an undesirable substance, such as used coffee grounds, dirt, or kitty litter.

2. Place the mixture in a sealable bag, empty can,

or other container and throw in your household trash.\*



To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.

\*Source: U.S. Food and Drug Administration

## Appendix O

### Digital and Local Social Networks

The following is a representative list of local organizations and their social media networks in the County. MED-Project will reach out to relevant groups to help promote the Program.

OUTLET	FACEBOOK	TWITTER
510 Families	<a href="https://www.facebook.com/510Families">https://www.facebook.com/510Families</a>	@510families
Alameda Alliance	<a href="https://www.facebook.com/alamedaallianceforhealth">https://www.facebook.com/alamedaallianceforhealth</a>	@AlamedaAlliance
Alameda Blogs		@Alamedans
Alameda Buzz		@AlamedaBuzz
Alameda County	<a href="https://www.facebook.com/AlamedaCounty">https://www.facebook.com/AlamedaCounty</a>	@Alameda County
Alameda County Fair	<a href="https://www.facebook.com/alamedacountyfair">https://www.facebook.com/alamedacountyfair</a>	@ACFair
Sutter Health	<a href="https://www.facebook.com/SutterHealth">https://www.facebook.com/SutterHealth</a>	@SutterHealth
Alameda Health Consortium	<a href="https://www.facebook.com/alamedahealthconsortium">https://www.facebook.com/alamedahealthconsortium</a>	
Alameda Health System	<a href="https://www.facebook.com/AlamedaHealthSystem">https://www.facebook.com/AlamedaHealthSystem</a>	@AlamedaHealth
Alameda Patch	<a href="https://www.facebook.com/AlamedaPatch">https://www.facebook.com/AlamedaPatch</a>	@AlamedaPatch
Alameda Rotary Club	<a href="https://www.facebook.com/RotaryClubofAlameda">https://www.facebook.com/RotaryClubofAlameda</a>	@alamedarotaryclub
Alameda-Contra Costa Medical Association	<a href="https://www.facebook.com/Alameda-Contra-Costa-Medical-Association-148916421860535/?ref=br_rs">https://www.facebook.com/Alameda-Contra-Costa-Medical-Association-148916421860535/?ref=br_rs</a>	@EastBayDocs
Albany Patch	<a href="https://www.facebook.com/AlbanyCAPatch/?ref=br_rs">https://www.facebook.com/AlbanyCAPatch/?ref=br_rs</a>	@AlbanyPatch
CA Medical Assn	<a href="https://www.facebook.com/cmaphysicians">https://www.facebook.com/cmaphysicians</a>	@cmaphysicians
City of Fremont	<a href="https://www.facebook.com/cityoffremont">https://www.facebook.com/cityoffremont</a>	@Fremont_CA
California Pharmacist Association	<a href="https://www.facebook.com/CAPharm">https://www.facebook.com/CAPharm</a>	@CAPharm

California Nurses Association	<a href="https://www.facebook.com/nationalnurses">https://www.facebook.com/nationalnurses</a>	@NationalNurses
National Association of Social Workers California	<a href="https://www.facebook.com/naswca">https://www.facebook.com/naswca</a>	@naswca
City of Hayward	<a href="https://www.facebook.com/cityofhayward">https://www.facebook.com/cityofhayward</a>	@cityofhayward
City of Livermore	<a href="https://www.facebook.com/cityoflivermore">https://www.facebook.com/cityoflivermore</a>	@cityoflivermore
City of Oakland	<a href="https://www.facebook.com/oakland/">https://www.facebook.com/oakland/</a>	@CityofOakland
City of Union City	<a href="https://www.facebook.com/CityofUnionCity">https://www.facebook.com/CityofUnionCity</a>	@UnionCity_Gov
Downtown Oakland Association	<a href="https://www.facebook.com/downtownoak/">https://www.facebook.com/downtownoak/</a>	
East Bay Loop	<a href="https://www.facebook.com/eastbayloop/">https://www.facebook.com/eastbayloop/</a>	@EastBayLoop
Eastmont Wellness Center	<a href="https://www.facebook.com/pages/Eastmont-Wellness-Center/131624876909152?ref=br_tf">https://www.facebook.com/pages/Eastmont-Wellness-Center/131624876909152?ref=br_tf</a>	
Fremont Patch Foundation	<a href="https://www.facebook.com/FremontCAPatch">https://www.facebook.com/FremontCAPatch</a>	@FremontPatch
Livermore Library	<a href="https://www.facebook.com/pages/Livermore-Public-Library/99365063645">https://www.facebook.com/pages/Livermore-Public-Library/99365063645</a>	@livlibrary
Oakland Local	<a href="https://www.facebook.com/oaklocal">https://www.facebook.com/oaklocal</a>	@oaklandlocal
Oakland Magazine	<a href="https://www.facebook.com/oaklandmagazine">https://www.facebook.com/oaklandmagazine</a>	@eastbay365
Oakland Police Department	<a href="https://www.facebook.com/oaklandpoliceca/">https://www.facebook.com/oaklandpoliceca/</a>	@oaklandpoliceca
Oakland Public Library	<a href="https://www.facebook.com/oaklibrary">https://www.facebook.com/oaklibrary</a>	@oaklibrary

