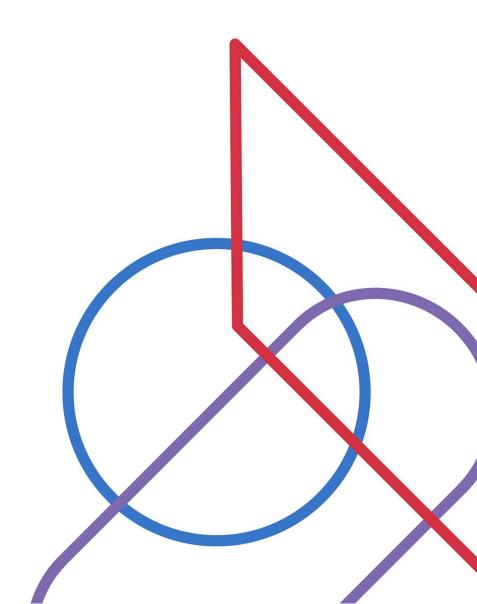


A Product Stewardship Plan for Unwanted Medicine from Households

Alameda County, California

Date: September 5, 2025



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Executive Summary

MED-Project LLC ("MED-Project") develops, implements, and operates stewardship programs for unwanted medicine from households on behalf of hundreds of participating Producers. MED-Project has substantial, practical, on-the-ground experience implementing unwanted medicine takeback programs in jurisdictions across the country, including the County. MED-Project currently administers an approved Product Stewardship Plan in the County, which has been in operation since 2015 and has served Residents by collecting over 430,000 pounds of Unwanted Medicine. Further, MED-Project's outreach and education efforts have thus far resulted in over 90 million impressions to Residents.

I. Introduction

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 Producers¹ to develop a Product Stewardship Program to finance and manage the collection, transportation, and disposal of Unwanted Medicine from County households. Upon Department approval, this Plan will supersede MED-Project's previously approved plans in their entirety, including, without limitation, their associated notices of determination or conditions of approval.

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

II. Contact Information

The Plan Liaison for MED-Project is:

Dr. Victoria Travis, PharmD, MS, MBA National Program Director MED-Project LLC 4096 Piedmont Ave Unit 174 Oakland, CA 94611

Phone: 1 (833) 633-7765 Fax: 1 (866) 633-1812

Email: alamedacounty@med-project.org

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.

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 and Mail-Back Distribution Locations that can be reached by callers at a toll-free number and/or by email at alamedacounty@med-project.org.

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.

Injector Mail-Back Services is the provision of pre-paid, pre-addressed, FDA-cleared sharps containers for the collection and disposal of pre-filled injector products ("**Injector 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.

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

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

Mail-Back Distribution Location is a site that is accessible to the public, such as a fire station or library, which provides Standard Mail-Back Packages to Residents.

Mail-Back Services is the provision of pre-paid, pre-addressed containers, envelopes, or packages ("**Mail-Back Packages**") to Residents for the collection and disposal of Unwanted Medicine by Vendor.

MED-Project Website is the Internet website located at www.med-project.org or www.med-project.org.

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

Pre-filled Injector Products are pre-filled injector products with a retractable or otherwise securely covered needle where medicine cannot be removed from them or where they contain more than trace amounts of Covered Drugs.

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.

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

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.

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 Medicine²

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 an 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)
- xv. Schedule I or other illicit drugs.

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

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² Unwanted Medicine collected at Kiosk Drop-Off Sites does not include Pre-filled Injector Products. Unwanted Medicine collected in Standard Mail-Back Packages does not include inhalers or Pre-filled Injector Products.

V. Collection of Unwanted Medicine

The Plan provides services to collect Unwanted Medicine, including controlled substances. The Program accepts 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. Convenience

MED-Project has established a network of convenient Kiosk Drop-Off Sites that adequately meets the needs of the Residents in the County. See Appendix B for a list of participating sites. Mail-Back Services are available upon request for all Residents, including disabled and/or 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. If the number of Kiosk Drop-Off Sites falls below 50 locations, distributed jointly, in combination with all other approved stewardship organizations, Mail-Back Distribution Locations will be used to supplement Kiosk Drop-Off Sites on a one-for-one basis.

2. Services

MED-Project routinely assesses performance, gauges feedback, and revises its approach to services and convenience as appropriate.

The Program is implemented in a flexible manner, offering coverage to Residents through a combination of Kiosk Drop-Off Sites and Mail-Back Services. Agreements outlining the responsibilities of the involved parties are reviewed by appropriate entities and signed by the parties before participation in the Program.

Mail-Back Services are available to Residents via the Call Center and MED-Project Website. See Section V.D. for more information about the availability of Mail-Back Services.

B. Kiosk Drop-Off Sites

Kiosk Drop-Off Sites are conveniently placed across the County.

1. Kiosk Drop-Off Site Locations

Kiosk Drop-Off Sites that are participating in the Program are identified in Appendix B.

As required under Ordinance § 6.53.070(E), MED-Project will include as a Kiosk Drop-Off Site eligible LEA or retail pharmacy sites willing to serve voluntarily who submit a written expression of interest to participate to MED-Project, and who are able to meet all applicable laws, regulations, and other legal requirements. Locations currently serving

as a kiosk drop-off site may participate in the Program by signing agreements with MED-Project and modifying their DEA registrations, if required.

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 are 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 are paid by MED-Project per the agreements with the Kiosk Drop-Off Site Hosts.

The maintenance program addresses items such as:

- Monitoring the kiosk for proper functioning; and
- Reporting issues regarding the kiosk to the MED-Project Help Desk.

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 is offered to eligible host locations. Pursuant to DEA Rule § 1317.75, MED-Project kiosks at pharmacies must:

- 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 noncontrolled 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 (<u>Appendix C</u>) satisfies these requirements through the use of heavy gauge steel; multiple locking mechanisms, including a locking mechanism on the drop-slot; a tamper-resistant chute; 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 Rule³ 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 the 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).

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. See DEA Rule § 1317.35. Additionally, any Unwanted Medicine will be stored in a manner to prevent the diversion of controlled substances and consistent

³ 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."

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 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.

5. Collection Method

MED-Project provides for the collection, transport, and disposal of Unwanted Medicine at no cost to the Kiosk Drop-Off Site.

Kiosk Drop-Off Site Hosts are provided with instructions for the management of the Unwanted Medicine collection box and inner liner in accordance with the Kiosk Drop-Off Site Host agreement. Guidance materials are available to the Kiosk Drop-Off Sites, including instructions on how to safely pack and seal the inner liner for shipping as soon as it is full. This method enables the Kiosk Drop-Off Site employees to avoid disruptions to operations and service the kiosk at the time of their choosing. The Kiosk Drop-Off Site employees prepare the inner liner for shipment and schedule a Carrier to pick up the packaged inner liner through MED-Project systems or offer the packaged inner liner during a regular Carrier pick-up.

6. Kiosk Service

When servicing a kiosk at a Kiosk Drop-Off Site, Kiosk Drop-Off Site employees will:

- Check the kiosk for any damage;
- Remove the inner liner and box from the kiosk and seal them at once, following procedures meeting all DEA requirements;
- Replace the removed inner liner and box with a replenishment inner liner and box provided by Vendor;
- Match the unique identifier of the inner liner to the tracking number on the shipping label;
- Package the inner liner for transport;
- Prepare the materials for shipment and perform applicable pre-transportation functions following the DOT HMR; and
- Schedule a pick-up from the Carrier to be completed within a few business days or offer the packaging holding the sealed inner liner for pick-up by routine Carrier service at the Kiosk Drop-Off Site.

The Kiosk Drop-Off Site employees store the inner liner in compliance with all applicable laws, regulations, and other legal requirements until Carrier pick-up.

C. Disposal of Unwanted Medicine from Kiosk Drop-Off Sites

Kiosk Drop-Off Site employees, Vendor, and Carrier shall manage the Unwanted Medicine from Kiosk Drop-Off Sites in compliance with all applicable laws, regulations, and other legal requirements. Carrier shall deliver Unwanted Medicine collected from Kiosk Drop-Off Sites to the respective facilities identified in Section X. Each sealed inner liner and box containing Unwanted Medicine will be weighed at the receiving facility.

Unwanted Medicine is destroyed in accordance with all applicable laws, regulations, and other legal requirements at the disposal facilities identified in Section X.

D. Mail-Back Services for Unwanted Medicine

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

- Standard Mail-Back Services for the collection of Unwanted Medicine as described in Section V.D.1.:
- Inhaler Mail-Back Services for the collection of inhalers as described in Section V.D.2.; and
- Injector Mail-Back Services for the collection of Pre-filled Injector Products as described in Section V.D.3.

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

For Unwanted Medicine, MED-Project offers Standard Mail-Back Services at no cost to Residents, via the Call Center and MED-Project Website. The pre-paid shipping label directs the Standard Mail-Back Package to an approved 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 are:

- 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.

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 D for a Standard Mail-Back Package image and package specifications.

2. Inhaler Mail-Back Services for Inhalers

For inhalers, MED-Project offers Inhaler Mail-Back Services at no cost to Residents via the Call Center and MED-Project Website. The pre-paid shipping label directs the Inhaler Mail-Back Packages to an approved facility identified in Section X. An instruction sheet is 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 D for an Inhaler Mail-Back Package image and package specifications.

3. Injector Mail-Back Services for Pre-Filled Injector Products

For Pre-filled Injector Products, MED-Project offers Injector Mail-Back Services at no cost to Residents, via the Call Center and MED-Project Website. The pre-paid shipping label directs the Injector Mail-Back Packages to an approved facility identified in Section X. An instruction sheet is included with the Injector Mail-Back Package that describes how to properly dispose of the Pre-filled Injector Products, explains what materials may be placed in the Injector Mail-Back Package, and how to return the Injector Mail-Back Package.

See Appendix D for an Injector Mail-Back Package image and package specifications.

4. Mail-Back Package Availability

Residents may request Standard Mail-Back Packages, Inhaler Mail-Back Packages, and/or Injector Mail-Back Packages by calling the Call Center or through a link on the MED-Project Website. If the number of Kiosk Drop-Off Sites falls below 50 locations, distributed jointly, in combination with all other approved stewardship organizations, Mail-Back Distribution Locations that disseminate Standard Mail-Back Packages will be used to supplement Kiosk Drop-Off Sites on a one-for-one basis.

Each Mail-Back Package contains an insert with instructions for use and information about other options for disposing of Unwanted Medicine in the Specified Languages. See Appendix D for Mail-Back Package images.

5. Mail-Back Package Collection and Disposal

Requests to receive Mail-Back Packages are taken through the Call Center and the MED-Project Website. Residents are 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 is sent to an approved disposal facility in compliance with all applicable laws, regulations and other legal requirements. Each Mail-Back Package has a unique identifier for tracking.

For Standard Mail-Back Packages, upon arriving at the disposal facility, the Mail-Back Packages are scanned for receipt verification and incinerated at the disposal facilities listed in Section X. Any storage of filled Standard Mail-Back Packages by Vendor complies 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. Unwanted Medicine in Standard Mail-Back Packages is weighed and destroyed promptly at the receiving facility. The total amount by weight collected through Mail-Back Services may be provided using an actual or an average weight per Mail-Back Package, as provided by Vendor.

VI. Goals

The short-term and long-term goals of the Plan are described generally as follows.

Goal Area	Short-Term and Long-Term Goals:
Collection	 Maintain Kiosk Drop-Off Sites across the County to provide equitable and reasonably convenient access for Residents as follows: If the number of Kiosk Drop-Off Sites falls below 50 locations (distributed jointly, in combination with all other approved stewardship organizations), Mail-Back Distribution Locations will be used to supplement Kiosk Drop-Off Sites on a one-for-one basis. Additionally, MED-Project may send a letter to potential Kiosk Drop-Off Site Hosts outlining the opportunity to participate in the Program. Maintain Mail-Back Services via the MED-Project Website and Call Center.
Education & Public Outreach	Continue media program consistent with Regulations § 8.A.viii via the following: • MED-Project Website. • Call Center. • Media campaigns (for example, digital display, connected TV, streaming audio, or social media).

VII. Patient Privacy

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

In addition to kiosk signage, MED-Project promotional and educational materials encourage Residents to protect their information by removing identifiable information before depositing containers into kiosks or Mail-Back Packages. As an added protection, inner liners for the kiosks are opaque rather than clear, in compliance with DEA Rule.

VIII. Call Center

MED-Project has established a toll-free telephone number for Residents to obtain information about Kiosk Drop-Off Sites, Mail-Back Services, educational materials, and other aspects of the Program. Callers with medical emergencies are directed to call 911. Patients with medication-related questions are directed to contact their health care provider(s).

The Call Center provides information about:

- Items that can be disposed of;
- Disposal options;
- Kiosk Drop-Off Sites and disposal options in the caller's specified ZIP code;
- The MED-Project Website; and
- How to obtain Mail-Back Packages.

To increase access to the Program for Residents, MED-Project has included dialing options for TTY and 711 services.

IX. Kiosk Drop-Off Site Training

At a Kiosk Drop-Off Site, operational procedures, including training, are the responsibility of the Kiosk Drop-Off Site Host. Included in the training materials are documents that address:

- Permit requirements;
- Management of kiosks, including cleanliness, monitoring the kiosk for proper functioning, and how to report issues regarding the kiosk to MED-Project; and
- Proper inner liner setup and closure, preparation of shipment, and timely removal of the packaged inner liner from the site.

MED-Project provides a system that allows Kiosk Drop-Off Site Hosts to request resources or support anytime. MED-Project also provides a 24/7 Help Desk to answer questions, monitor comments, and fulfill requests from participating Kiosk Drop-Off Sites and Mail-Back Distribution Locations.

X. Vendor, Reverse Distributor, Transporter, Disposal, and Transfer 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.

A. Vendors

Name	Address	Phone	Website	Туре	Penalty Record (5 years)
PureWay Compliance, Inc.	16225 Park Ten Place, Suite 830, Houston, TX 77084	(877) 765- 3030	www.pureway. com	Vendor	None
Stericycle, Inc.	2355 Waukegan Road, Bannockburn, IL 60015	(847) 367- 5910	www.stericycl e.com	Vendor	None

B. Reverse Distributor

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Stericycle, Inc. Warren, Ohio Facility	1901 Pine Avenue, SE, Warren, OH 44483	(330) 393- 0370	www.stericy cle.com/	DEA Registered Collector and Reverse Distributor	DEA Registration No: RS0498130	See Appendix E

C. Carriers and Transporters

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Clean Harbors Environme ntal Services Inc.	1021 Berryessa Road, San Jose, CA 95113	(408) 441- 0962	www.cleanh arbors.com	Hazardous Waste Transporter	DOT No: 180743	See Appendix E
Sharps Solutions, LLC	23575 Cabot Blvd., Ste 205, Hayward, CA 94545	(877) 446- 8449	http://sharp s- solutions.co m/contact/	Private Carrier	DOT No: 2810784	None
Stericycle Inc.	2355 Waukegan Road, Bannockbur n, II 60015	(847) 367- 5910	www.stericy cle.com	Hazardous Waste Transporter	DOT No: 397962	None
United Parcel Service, Inc.	55 Glenlake Parkway NE, Atlanta, GA 30328	(800) PICK- UPS	www.UPS.c om/	Carrier	DOT No: 21800	None

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
United States Postal Service	475 L'Enfant Plaza SW, Washington , DC 20260	(202) 268- 2000	www.USPS .com/	Carrier	N/A	See USPS SEC filings

D. Disposal Facilities

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Clean Harbors Aragonite, LLC	11600 North Aptus Rd, Grantsville, UT 84029	(435) 884- 8900	www.cleanh arbors.com/	Hazardous Waste Incinerator	EPA ID No: UTD981552 177 Title V Operating Permit No: 450004800 4	See Appendix E
Curtis Bay Energy, LP	3200 Hawkins Point Road, Baltimore, MD 21226	(855) 228- 1715	www.curtisb aymws.com	Medical Waste Incinerator	EPA ID No: MDD98540 4318 Refuse Disposal Permit No: 2017-WMI- 0036	See Appendix E
Arcwood Environme ntal – East Liverpool, Inc. (Formerly Heritage Thermal Services – Ohio)	1250 Saint George Street, East Liverpool, OH 43920	(800) 545- 7655	http://www. arcwoodenv iro.com/	Hazardous Waste Incinerator	EPA ID No: OHD98061 3541 Title V Operating Permit No: OH0000000 215020233	See Appendix E

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Stericycle, Inc., Warren, Ohio Facility	1901 Pine Avenue SE, Warren, OH 44483	(866) 783- 6275	https://www .stericycle.c om	Medical Waste Incinerator	EPA ID No: OHD98079 5280 Title V Operating Permit No: P0128242	See Appendix E

E. Transfer Facility

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Clean Harbors Environme ntal Solutions	1021 Berryessa Rd. San Jose, CA 95133	(408) 729- 3379	www.cleanh arbors.com	Registered Medical Waste Transfer Station	Medical Waste Permit TS- 51	See Appendix E

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

A comprehensive communications campaign featuring both general awareness strategies and targeted outreach to audiences directly involved in the distribution and use of medicines to Residents will educate the public about the Program. These audiences may include:

- General public;
- Pharmacies, including education for dispensers of Covered Drugs;
- Retailers of Covered Drugs;
- Health care providers and their patients; and
- Veterinary providers and animal owners.

The Program will include efforts designed to reach a broad range of diverse audiences. The Program will make available a multilingual Call Center (Section XI.D.1.) and will make available educational information through a range of media platforms.

C. Messages

MED-Project's 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 Kiosk Drop-Off Sites and Mail-Back Distribution Locations in their area that offer disposal of Unwanted Medicine.

Key points of emphasis might include:

- 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 information (removing personally identifiable information from labeled prescription containers).

D. Tools/Communications Channels

The Program will include a number of components designed to reach consumers and provide consistent access to timely and relevant information.

MED-Project will execute a measurable public education and outreach strategy aimed at driving awareness of take-back of Unwanted Medicine and in accordance with Ordinance §§ 6.53.050 (A) (8) and 6.53.070.

MED-Project will use a combination of the following tools and communication channels:

1. Phone

The Program provides a Call Center for Residents to obtain information about Kiosk Drop-Off Sites, Mail-Back Services, Mail-Back Distribution Locations, educational materials, and other aspects of the Program for the take back of Unwanted Medicine from households. The Call Center provides:

- Assistance in the Specified Languages;
- Information about how the Program works, and how to obtain more information (e.g., the MED-Project Website);
- An option to speak with an agent to locate Kiosk Drop-Off Sites and/or Mail-Back Distribution Locations, if applicable, in the Resident's ZIP code or local area; and
- Information about Mail-Back Services, including how to request a pre-paid and pre-addressed Mail-Back Package.

The Call Center also provides 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).

MED-Project will provide a mobile-friendly MED-Project Website with translations available in the Specified Languages. The MED-Project Website allows Residents to request Mail-Back Packages, provides information on locations of Kiosk Drop-Off Sites and, if applicable, Mail-Back Distribution Locations, and provides access to educational materials and answers to frequently asked questions. Promotional and educational materials will be provided on the MED-Project Website, including brochures and Mail-Back Package inserts, with translations available in the Specified Languages. Public interest groups will be encouraged to use these resources to promote the Program. Appendix F contains a sample mockup of the MED-Project Website and supporting pages.

2. Materials

Educational materials about the Program and how to properly dispose of Unwanted Medicine are provided for dissemination, upon request, through the MED-Project Website and the Call Center, to interested parties, including healthcare facilities,

pharmacies, and Kiosk Drop-Off Sites. The educational brochure is provided in Appendix G.

3. Social Media

MED-Project uses social media to communicate outreach information about Kiosk Drop-Off Sites and Mail-Back Services. Posts are made as needed to reflect the most up-to-date information.

E. Survey

MED-Project will conduct a biennial survey of Residents in the County to measure awareness of the take-back of Unwanted Medicine from households.

F. Disclaimer

The written and verbal educational materials and public outreach tools that are required by the Ordinance and disseminated under this Product Stewardship Plan may 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),41317.70(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 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 the use of mail-back programs to collect controlled substances;
- Allows for the commingling of controlled and non-controlled substances;

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⁴ 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 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).

- 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. The collection, transportation, and disposal of Unwanted Medicine collected from Kiosk Drop-Off Sites and Mail-Back Services, including controlled substances, will comply with applicable DEA requirements.

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

1. DEA 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. 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)

The transporting of Unwanted Medicine will comply with the U.S. DOT HMR and other applicable DOT requirements.

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; and
- 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.

Appendix A

MED-Project Participating Producers

The list of participating Producers in the Program in the County is provided to the County on a periodic basis to satisfy Ordinance requirements. The County was provided with an updated list on July 14, 2025.

Appendix B Participating Kiosk Drop-Off Sites

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Site Name	Address	City	Zip Code
Access Pharmacy	2693 Fruitvale Ave	Oakland	94601
Alameda Health System - San Leandro Hospital	13855 East 14th Street	San Leandro	94578
Alameda Hospital	2070 Clinton Avenue	Alameda	94501
BART Police Department	101 8th Street	Oakland	94607
Berkeley Police Department	2100 Martin Luther King Jr. Way	Berkeley	94704
California State University, East Bay	25800 Carlos Bee Boulevard	Hayward	94542
Capsmart Pharmacy	2557 Mowry Avenue, Suite 11	Fremont	94538
Clover Pharmacy	6170 Thornton Avenue	Newark	94560
Community a Walgreens Pharmacy 16477	3009 Broadway	Oakland	94611
CVS Pharmacy 03024	7201 Regional Street	Dublin	94568
CVS Pharmacy 08431	7200 Bancroft Avenue	Oakland	94605
CVS Pharmacy 09099	4020 Fremont Hub	Fremont	94538
CVS Pharmacy 09128	2314 Santa Clara Avenue	Alameda	94501
CVS Pharmacy 09130	175 41st Street	Oakland	94611
CVS Pharmacy 09226	3320 Fruitvale Avenue	Oakland	94602

Site Name	Address	City	Zip Code
CVS Pharmacy 09234	46445 Mission Boulevard	Fremont	94539
CVS Pharmacy 09251	3999 Santa Rita Road	Pleasanton	94588
CVS Pharmacy 09378	4100 Redwood Road	Oakland	94619
CVS Pharmacy 09397	4405 First Street	Livermore	94551
CVS Pharmacy 09494	35080 Newark Boulevard	Newark	94560
CVS Pharmacy 09600	35720 Fremont Boulevard	Fremont	94536
CVS Pharmacy 09622	243 West Jackson Street	Hayward	94544
CVS Pharmacy 09635	1550 East 14th Street	San Leandro	94577
CVS Pharmacy 09678	1500 First Street	Livermore	94550
CVS Pharmacy 09876	699 Lewelling Boulevard	San Leandro	94579
CVS Pharmacy 09904	3667 Castro Valley Boulevard	Castro Valley	94546
CVS Pharmacy 09941	1451 Shattuck Avenue	Berkeley	94709
CVS Pharmacy 09942	1401 Washington Avenue	San Leandro	94577
CVS Pharmacy 10119	6750 Bernal Avenue	Pleasanton	94566
CVS Pharmacy 10121	2655 Telegraph Avenue	Berkeley	94704
CVS Pharmacy 10199	26059 Mission Boulevard	Hayward	94544
CVS Pharmacy 10924	3010 Bernal Avenue	Pleasanton	94566

Site Name	Address	City	Zip Code
Dublin Police Services	6361 Clark Avenue	Dublin	94568
Emeryville Police Department	2449 Powell Street	Emeryville	94608
Haller's Pharmacy and Medical Supply	37323 Fremont Boulevard	Fremont	94536
Highland Hospital Outpatient Pharmacy	1411 East 31st Street	Oakland	94602
Jade Pharmacy	34460 Fremont Blvd, Suite B	Fremont	94555
Kaiser Alameda MOB OP Pharmacy 101	2417 Central Ave.	Alameda	94501
Kaiser Berkeley OP Pharmacy 910	2621 Tenth Street	Berkeley	94710
Kaiser Dublin MOB Pharmacy 061	3100 Dublin Blvd Fl 1	Dublin	94568
Kaiser Fremont Ohlone OP Pharmacy 162	39400 Paseo Padre Pkway	Fremont	94538
Kaiser Livermore OP Pharmacy 241	3000 Las Positas Road	Livermore	94551
Kaiser Oak Broadway 1FI OP Pharmacy 102	3701 Broadway FI 1	Oakland	94611
Kaiser Oak Fabiola A 1FI OP Pharmacy 115	3801 Howe Street	Oakland	94611
Kaiser Oakland Main Pharmacy 105	3600 Broadway FI 1	Oakland	94611

Site Name	Address	City	Zip Code
Kaiser Pleasanton South 1 Pharmacy 471	7601 Stoneridge	Pleasanton	94588
Kaiser San Leandro Discharge Pharmacy 923	2500 Merced Street, Bldg. H, FL 1, Room 1436	San Leandro	94577
Kaiser Union City Main MOB 2 Pharmacy 132	3553 Whipple Rd.	Union City	94587
Mission Pharmacy	22138 Mission Boulevard	Hayward	94541
Mowry Medical Pharmacy	1999 Mowry Avenue, Suite A-2	Fremont	94538
New Oakland Pharmacy - Lake Merritt	250 East 18th Street, 3rd Floor	Oakland	94606
New Oakland Pharmacy 1	333 9th Street	Oakland	94607
New Oakland Pharmacy 2	388 9th Street, Suite 108	Oakland	94607
Piedmont Police Department	403 Highland Avenue	Piedmont	94611
Pleasanton Police Department	4833 Bernal Avenue	Pleasanton	94566
Teds Drugs	27453 Hesperian Boulevard	Hayward	94545
Tennyson Pharmacy	589 West Tennyson Road	Hayward	94544
Walgreens 00101	3382 Castro Valley Blvd	Castro Valley	94546
Walgreens 01537	3232 Foothill Boulevard	Oakland	94601

Site Name	Address	City	Zip Code
Walgreens 02150	1763 Santa Rita Road	Pleasanton	94566
Walgreens 02306	1138 W Tennyson Road	Hayward	94544
Walgreens 02314	1050 Gilman Street	Berkeley	94710
Walgreens 02366	3860 Decoto Road	Fremont	94555
Walgreens 02426	15500 Washington Avenue	San Leandro	94579
Walgreens 02660	41400 Blacow Road	Fremont	94538
Walgreens 04050	1916 Webster Street	Alameda	94501
Walgreens 04517	2600 Mowry Avenue	Fremont	94538
Walgreens 04614	2801 Adeline Street	Berkeley	94703
Walgreens 06502	23958 Hesperian Boulevard	Hayward	94541
Walgreens 09248	2300 Otis Drive	Alameda	94501
Walgreens 10526	3250 Lakeshore Avenue	Oakland	94610
Walgreens 13595	1333 Broadway	Oakland	94612
Walgreens 15163	1620 First Street	Livermore	94550
Wellspring Pharmacy	4184 C Piedmont Avenue	Oakland	94611

Appendix CSample Kiosk Mock-Up



Sample Kiosk Signage

Kiosk Drop-Slot Panel 11" x 5"



Kiosk Drop-Slot Panel 6" x 2"

Name: 123 Pharmacy

Contact: (555) 555-555

USA.KA.01.000011.ALL.01.01.45.02.00

SAFELY DISPOSE OF EXPIRED OR UNWANTED MEDICINE



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



Leave the product in its original container or place solid medicine in a sealed plastic bag.

If transferring medication to a sealed bag, please be sure to recycle remaining packaging.



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 klosk, 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.

For more information about the MED-Project program, please to go to www.med-project.org or call 1-844-MED-PROJECT / 1 (844) 633-7765 (TTY: 711)



Link of the designation of the electric electric



MED-Project Call Center: 1 (844) MED-PROJECT 1 (844) 633-7765 / (TTY: 711) www.med-project.org



Appendix DSample Mail-Back Packages

Sample Standard Mail-Back Package



Description:

Plastic envelope with return label, instructional flyer, and unique identifier enabling tracking from collection through disposal.

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, subject to requirements in the Ordinance and Regulations.

Sample Inhaler Mail-Back Package



Description:

Inhaler Mail-Back Package including container with mail-back packaging, return label, instructional flyer and unique identifier enabling tracking from collection through disposal.

Package Size:

Outer dimensions: 5" x 5" x 9"

Inhaler Mail-Back Services 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, subject to the requirements of the Ordinance and Regulations.

Sample Injector Mail-Back Package





Description:

Injector Mail-Back Package includes an FDA-cleared sharps container with mail-back packaging, return label, instructional flyer, and unique identifier enabling tracking from collection through disposal.

Package Size:

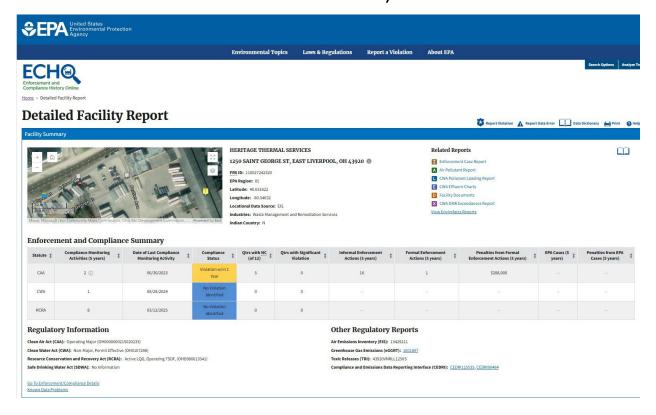
1.4-quart mail-back system

MED-Project may choose to change its Vendor for Injector Mail-Back Services at any time, subject to requirements in the Ordinance and Regulations

Appendix E

Penalty Records

Arcwood Environmental – East Liverpool, Inc. (Formerly Heritage Thermal Services – Ohio)



CAA	1~				Lead Agency ‡		
	11.4	1~	I~	I.	1~	20103.0	
	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE On Site	State	05/20/2025	
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	03/05/2025	Reviewed: 03/20/2025 Facility Reported Deviations
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	03/20/2024	Reviewed: 04/12/2024 Facility Reported Deviations
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	FCE On-Site	State	06/30/2023	
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE On-Site Monitoring/Sampling	EPA	06/08/2023	
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE On Site	State	05/31/2023	
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	04/03/2023	Reviewed: 05/03/2023 Facility Reported Deviations
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	04/06/2022	Reviewed: 05/03/2022 Facility Reported Deviations
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE Off-Site	EPA	12/01/2021	
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	FCE On-Site	State	08/16/2021	
CAA	OH0000000215020233	ICIS-Air	Inspection/Evaluation	PCE On-Site	State	07/21/2021	
CAA	OH0000000215020233	ICIS Air	Inspection/Evaluation	PCE Title V CCR	State	03/26/2021	Reviewed: 04/15/2021 Facility Reported No Deviations
CAA	OH0000000215020233	ICIS-Air	Information Request	Formal	EPA	02/04/2021	
CWA	OH0107298	ICIS-NPDES	Inspection/Evaluation	Base Program - Evaluation	EPA	08/28/2024	
RCRA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	04/14/2025	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	EPA	03/12/2025	Undetermined, Agency May Still be Determining
RCRA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	01/13/2025	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	State	12/10/2024	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Focused Compliance Inspection	State	12/10/2024	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	ICIS	Inspection/Evaluation	Focused	EPA	07/31/2024	
RCRA	OHD980613541	RCRAInfo		Focused Compliance Inspection	EPA	07/31/2024	Undetermined, Agency May Still be Determining
RCRA	OHD980613541	RCRAInfo		Financial Record Review	State	04/15/2024	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Focused Compliance Inspection	State	12/27/2023	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	State	12/14/2023	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Financial Record Review	State	09/26/2023	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo/ICIS	Inspection/Evaluation	Compliance Evaluation Inspection	EPA	09/20/2023	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Focused Compliance Inspection	State	02/08/2023	No Violations Or Compliance Issues Were Found
RCRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	State	02/08/2023	No Violations Or Compliance Issues Were Found
:RA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	01/03/2023	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Financial Record Review	State	09/28/2022	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	State	03/15/2022	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	11/19/2021	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	11/03/2021	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Financial Record Review	State	09/30/2021	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	09/30/2021	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Focused Compliance Inspection	State	03/25/2021	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	State	03/25/2021	No Violations Or Compliance Issues Were Found
CRA	OHD980613541	RCRAInfo		Compliance Evaluation Inspection	State	09/15/2020	No Violations Or Compliance Issues Were Found
:RA	OHD980613541	RCRAInfo		Non-Financial Record Review	State	09/01/2020	No Violations Or Compliance Issues Were Found

Compliance Summary Data

Statute ‡	Source ID ‡	Current SNC/HPV ‡	Current As Of ‡	Qtrs with NC (of 12) \$\Bigsleft\$	Data Last Refreshed ‡
CAA	OH000000215020233	No	07/19/2025	5	07/18/2025
CWA	OH0107298	No	03/31/2025	0	07/18/2025
RCRA	OHD980613541	No	07/19/2025	0	07/18/2025

Statute		Program	m/Pollutant/Violation T	pe	QTR1	QTR 2	QTR 3	QTR4	QTR 5	QTR 6	QTR 7	QTRS	QTR 9	QTR 10	QTR 11	QTR 12+
	CA	(Source ID: 0	OH0000000215020233)		10/01-12/31/22	01/01-03/31/23	04/01-06/30/23	07/01-09/30/23	10/01-12/31/23	01/01-03/31/24	04/01-06/30/24	07/01-09/30/24	10/01-12/31/24	01/01-03/31/25	04/01-06/30/25	07/01-09/30/25
		90	Facility-Level Status		No Violation Identified	No Violation Identified	No Violation Identified	Violation Identified	Violation Identified	Violation Identified	No Violation Identified	Violation Identified	Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified
			HPV History													
	Violation Type	Agency	Programs	Pollutants												
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	FACIL					11/05/2023							
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	VOLATILE ORGANIC COMPOUNDS (VOCS), FACIL								09/27/2024				
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	VOLATILE ORGANIC COMPOUNDS (VOCS), FACIL									12/23/2024			
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	VOLATILE ORGANIC COMPOUNDS (VOCS), FACIL						01/03/2024						
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	VOLATILE ORGANIC COMPOUNDS (VOCS), FACIL				09/15/2023								
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	VOLATILE ORGANIC COMPOUNDS (VOCS), FACIL								07/26/2024				
Statute	Program/P	ollutant/Viola Type	tion QTR	1 QTR 2	QTR :	в Отв	4 Q	TR5	QTR 6	QTR7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13+ ①
CI	WA (Source ID: O	H0107298)	04/01-06								01/01-03/31/24	04/01-06/30/24	07/01-09/30/24	10/01-12/31/24	01/01-03/31/25	04/01-07/18/25
	Facility	Level Status	No Viola Identif						Violation I entified	No Violation Identified	Undetermined					

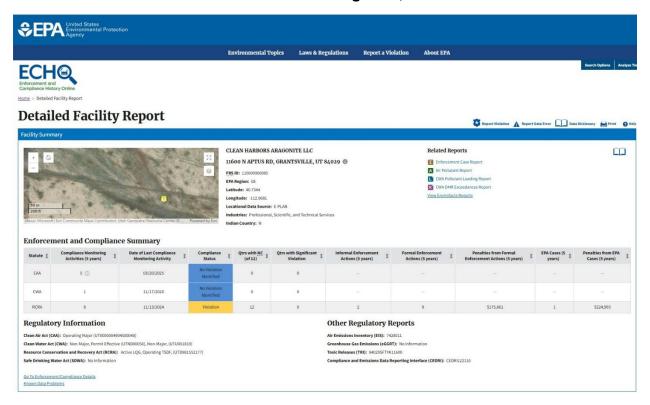
	CWA (Source ID: OH0107298)	04/01-06/30/22	07/01-09/30/22	10/01-12/31/22	01/01-03/31/23	04/01-06/30/23	07/01-09/30/23	10/01-12/31/23	01/01-03/31/24	04/01-06/30/24	07/01-09/30/24	10/01-12/31/24	01/01-03/31/25	04/01-07/18/25
	Facility-Level Status	No Violation Identified	Undetermined											
	Quarterly Noncompliance Report History													
Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTRS	QTR 6	QTI	17	QTR 8	QTR9	QTR 10	QTR 11	QTR 12+
RCR	RA (Source ID: OHD980613541)	10/01-12/31/22	01/01-03/31/23	04/01-06/30/23	07/01-09/30/23	10/01-12/31/2	3 01/01-03/31	/24 04/01-0	/30/24 07/0	1-09/30/24 10	/01-12/31/24	01/01-03/31/25	04/01-06/30/25	07/01-09/30/25
		No Violation	Nevislation	No Violation	No Molation	Mo Molation	No Violatio	m No Visi	stine Ne	Violation	Vo Violation	No Molatino	No Molation	Nexionation

al Enforcemen	t Actions Last 5 Years \$				
Statute ‡	System ‡	Source ID ‡	Type of Action ‡	Lead Agency ‡	Date
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	06/09/2025
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	12/19/2024
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	09/11/2024
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	06/10/2024
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	12/01/2023
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	10/26/2023
CAA	ICIS Air	OH0000000215020233	Notice of Violation	State	05/30/2023
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	09/02/2022
CAA	ICIS Air	OH0000000215020233	Notice of Violation	State	05/13/2022
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	02/22/2022
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	11/08/2021
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	08/27/2021
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	05/12/2021
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	02/17/2021
CAA	ICIS Air	OH0000000215020233	Notice of Violation	State	11/24/2020
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	09/04/2020

Formal Enforcement Actions Last 5 Years 💲

Statute ‡	System ‡	Law/ Section ‡	Source ID ‡	Type of Action	No.	Lead Agency ‡	Case Name	Issued/ Filed Date	Settlements/ Actions	Settlement/ Action Date	Federal Penalty Assessed	State/ Local Penalty Assessed	Penalty Amount Collected	SEP Value	Comp Action Cost
CAA	ICIS-Air	112	AIR/OH0000000215020233	Judicial	05-2015 5085	EPA	HERITAGE- WTI	10/18/2018	1	04/01/2022	\$288,000	\$0	\$288,000	\$302,500	\$305,000

Clean Harbors Aragonite, LLC



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Statute ‡	Source ID	1	System ‡	Activity Type	- 1	Compliance Monitorin		Lead Agency	1	Date	1	Finding (if applicable)	
1~		1	1~		1~		1~	1.	V					
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua		E On-Site		State		03/20/2025				
CAA	U70000004904500048		ICIS-Air	Inspection/Evalua		E Title V CCR		State		09/20/2024	Reviewed: 12/	16/2024 Facility Repo	rted No Deviations	
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion FC	E On-Site		State	(04/05/2024				
CAA	UT0000004904500048		ICIS Air	Inspection/Evalua	tion PC	E Title V CCR		State		09/19/2023	Reviewed: 12/	08/2023 Facility Repo	rted Deviations	
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion PC	E Stack Test		State		05/04/2023	Findings: Pass			
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion FC	FCE On-Site		State	(04/13/2023				
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion PC	E Title V CCR		State		09/22/2022	Reviewed: 04/	18/2023 Facility Repo	rted No Deviations	
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion FC	E On-Site		State		07/27/2022				
CAA	U70000004904500048		ICIS-Air	Inspection/Evalua	tion PC	E Title V CCR		State		09/21/2021	Reviewed: 09/	30/2021 Facility Repo	rted No Deviations	
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion FC	E On-Site		State		07/27/2021				
CAA	UT0000004904500048		ICIS-Air	Inspection/Evalua	tion PC	E Title V CCR		State		09/22/2020	Reviewed: 09/	30/2020 Facility Repo	rted Deviations	
CWA	UTU001819		ICIS-NPDES	Inspection/Evalua		dustrial Stormwater - Evaluation	00	State		11/17/2020				
RCRA	UTD981552177		RCRAInfo/ICIS	Offsite Record Rev		n-Financial Record Review		EPA		04/07/2025	No Violations	Or Compliance Issues	Mara Faund	
		- '		Onsie Record Rev										
RCRA	UTD981552177		RCRAInfo			ancial Record Review		State		01/09/2025		Or Compliance Issues		
RCRA	UTD981552177		RCRAInfo			mpliance Evaluation Inspection	on	State		11/13/2024		Or Compliance Issue		
RCRA	UTD981552177		RCRAInfo/ICIS	Offsite Record Rev	iew No	n-Financial Record Review		EPA		10/18/2024	Undetermined	d, Agency May Still be	Determining	
RCRA	UTD981552177		RCRAInfo		Co	mpliance Evaluation Inspection	on	State	(09/10/2024	Undetermine	d, Agency May Still be	Determining	
RCRA	UTD981552177		RCRAInfo/ICIS	Offsite Record Rev	iew No	n-Financial Record Review		EPA	-	02/29/2024	Undetermined	d, Agency May Still be	Determining	
RCRA	UTD981552177		RCRAInfo		Fit	nancial Record Review		State	- 1	01/29/2024	No Violations	Or Compliance Issues	Were Found	
RCRA	UTD981552177		RCRAInfo		Co	mpliance Evaluation Inspection	on	State	1	12/20/2023	Violations Or	Compliance Issues W	ere Found	
RCRA	UTD981552177		RCRAInfo/ICIS	Offsite Record Rev	iew No	n-Financial Record Review		EPA	12	10/05/2023	No Violations	Or Compliance Issues	Were Found	
RCRA	UTD981552177		RCRAInfo		Co	mpliance Evaluation Inspection	on	State		09/11/2023	Violations Or	Compliance Issues W	ere Found	
RCRA	UTD981552177		RCRAInfo		Fin	ancial Record Review		State		01/17/2023	No Violations	Or Compliance Issues	Were Found	
RCRA	UTD981552177		ICIS	Information Requ	est Fo	rmal		EPA		09/29/2022				
RCRA	UTD981552177		RCRAInfo			mpliance Evaluation Inspection	00	State		08/30/2022	Violations Or	Compliance Issues W	ere Found	
RCRA	UTD981552177		RCRAInfo			mpliance Evaluation Inspection		State		08/30/2022		Compliance Issues W		
RCRA	UTD981552177		ICIS	Offsite Record Rev		n-Financial Record Review	OII.	EPA		07/29/2022	Violations of	Compilarice (asdes W	ere roona	
KLKA	010981552177		ICIS	Опите несога неч	iew ivo	п-нпапска несога неглем		EPR		01/29/2022				
CRA	UTD981552177		RCRAInfo		Fina	ncial Record Review		State	(01/31/2022	No Violations	Or Compliance Issues	s Were Found	
CRA	UTD981552177	F	RCRAInfo		Con	npliance Evaluation Inspection	n	State	0	08/30/2021	Violations Or	Compliance Issues W	Jere Found	
CRA	UTD981552177		RCRAInfo		Et a									
			Clound		Fina	ncial Record Review		State		06/28/2021	No Violations	Or Compliance Issues	Were Found	
CRA	UTD981552177		RCRAInfo			ncial Record Review		State State		06/28/2021 10/07/2020		Or Compliance Issues Or Compliance Issues		
CRA	UTD981552177				Fina		n		1		No Violations		s Were Found	
CRA	e Summary Data		RCRAInfo	ī	Fina	ncial Record Review	Current As Of	State	C	10/07/2020	No Violations	Or Compliance Issues W	Were Found Jere Found Data Last Refreshed	
apliance Statute	e Summary Data	Source II	RCRAInfo RCRAInfo	t	Con	ncial Record Review	Current As Of 07/19/2025	State	C	10/07/2020 09/09/2020 s with NC (of 12)	No Violations	Or Compliance Issues W	Were Found Jere Found Data Last Refreshed 07/18/2025	
apliance Statute CAA CWA	e Summary Data	Source II UT0000004904 UTND000	RCRAInfo PCRAInfo PCRAInfo PCRAInfo PCRAInfo PCRAInfo	İ	Corrent SNC/HPI No No	ncial Record Review	Current As Of 07/19/2025 03/31/2025	State	C	10/07/2020 09/09/2020 s with NC (of 12)	No Violations	Or Compliance Issues W	Were Found Jere Found Data Last Refreshed 07/18/2025	
apliance Statute CAA CWA CWA	e Summary Data	Source II UT0000004904 UTND000 UTU0018	RCRAInfo CREATINFO C	t	Current SNC/HPI No No No	ncial Record Review	Current As Of 07/19/2025 03/31/2025 03/31/2025	State	C	09/09/2020 s with NC (of 12) 0 0	No Violations	Or Compliance Issues W	Were Found Data Last Refreshed 07/18/2025 07/18/2025	
apliance Statute CAA CWA	e Summary Data	Source II UT0000004904 UTND000	RCRAInfo CREATINFO C	ţ	Corrent SNC/HPI No No	ncial Record Review	Current As Of 07/19/2025 03/31/2025	State	C	10/07/2020 09/09/2020 s with NC (of 12) 0 0	No Violations	Or Compliance Issues W	Data Last Refreshed 07/18/2025 07/18/2025 07/18/2025	
apliance Statute CAA CWA CWA RCRA	e Summary Data	Source II UT0000004904 UTND000 UTU0018 UTD981552	RCRAInfo RCRAInfo RCRAInfo P 1500048 199 11177	t	Current SNC/HPI No No No	ncial Record Review	Current As Of 07/19/2025 03/31/2025 03/31/2025	State	C	09/09/2020 s with NC (of 12) 0 0	No Violations	Or Compliance Issues W	Data Last Refreshed 07/18/2025 07/18/2025 07/18/2025	nload Data
ppliance Statute CAA CWA CWA RCRA	UTD981592177 • Summary Data • Compliance Histo • Program/Pollurant/Violation	Source II UT0000004904 UTND0000 UTU0018 UTD981552	RCRAInfo CRAInfo	QTR 2	Current SNC/HP No No No No No	ncial Record Review pliance Evaluation Inspectio	Current As Of 07/19/2025 03/31/2025 03/31/2025 07/19/2025	State State	Qtra Qtra QTR 7	10/07/2020 10/07/2020 10/07/2020 10/07/2020 10/07/2020 10/07/2020 112	No Violations Violations Or ‡	Or Compliance Issues W	### Data Last Refreshed ### 07/18/2025 ### 07/18/2025 ### 07/18/2025 ### 0 Down ### QTR 11	QTR
pliance Statute CAA CWA CWA RCRA	Summary Data Scompliance Hist Program/Polutant/Violation (Source ID: UT0000004904500048)	Source II UT0000004904 UTND0000 UTU0018 UTD981552	RCRAInfo RCRAInfo RCRAInfo D D D D D D D D D D D D D	QTR 2	Current SNC/HPI No No No No	ncial Record Review pliance Evaluation inspectio Trace Trace Trace	Current As Of 07/19/2025 03/31/2025 03/31/2025 07/19/2025	State State	Qtra	0,007,2020 10,007,2020 10,007,2020 10,007,2020 10,007,2020 10,007,2020 10,007,2020 10,007,2020 10,007,2020 10,007,2020	No Violations Or Violations Or	Or Compliance Issues W	Data Last Refreshed 07/18/2025 07/18/2025 07/18/2025 07/18/2025 07/18/2025	QTR
pliance Statute CAA CWA CWA RCRA	e Summary Data Summary Data Compliance Hisl Pregnant/Pollutant/(violation [Source ID: UT0000004904500048) Facility-Level Status	Source II UT0000004904 UTND0000 UTU0018 UTD981552	RCRAInfo CRAInfo	QTR 2	Current SNC/HPP No No No No No No No No No	ncial Record Review pliance Evaluation Inspectio	Current As Of 07/19/2025 03/31/2025 03/31/2025 07/19/2025	State State	Qtra Qtra QTR 7	10/07/2020 10/07/2020 10/07/2020 10/07/2020 10/07/2020 10/07/2020 112	No Violations Violations Or ‡	Or Compliance Issues W	### Data Last Refreshed ### 07/18/2025 ### 07/18/2025 ### 07/18/2025 ### 0 Down ### QTR 11	QTR : 07/01-09 No Viol
pliance Statute CAA CWA CWA RCRA ee-Year te CAA(Summary Data 2 **Compliance Hist **Pregram/Poliutant/Violation Facility-level Status HPV History Ion Assay Pregram Pregram Research Resea	Source II UT0000004904 UTND000 UTU0018 UTD981552 COTY by (Type	CCAMno CC	QTR 2 01/01-03/31/23 No Violation	Current SNC/HPP No No No No No No No No No	ncial Record Review pliance Evaluation Inspectio f	Current As Of 07/19/2025 03/31/2025 03/31/2025 07/19/2025 QTR S 10/01-12/31/23 No Viciation	State State	Qtrd Qtrd Qtrd Qtrd Qtrd Qtrd Qtrd Notice020024	10-07/2020 99/09/2020 0 0 12 QTE 8 0701-09/30/20	No Violations Or Violations Or The state of the state o	Or Compliance Issues W. Compliance Issues W. QTR 10 QUR-03/31/25 No Violation	### SWere Found Data Last Refreshed	QTR : 07/01-09 No Viol
Statute CAA CWA CWA RCRA CWA CWA Violatin Type	Summary Data S Compliance Hist Pregram/Pollutant/Visitation Facility-Level Status HPV History Ion on Agency Programs of Agency Programs	Source II UT0000004904 UTND000 UTU0018 UTD981552 COTY by (Type	CCAMno CC	QTR 2 01/01-03/31/23 No Violation	Current SNC/HPP No No No No No No No No No	ncial Record Review pliance Evaluation Inspectio f	Current As Of 07/19/2025 03/31/2025 03/31/2025 07/19/2025 QTR S 10/01-12/31/23 No Viciation	State State	Qtrd Qtrd Qtrd Qtrd Qtrd Qtrd Qtrd Notice020024	10-07/2020 99/09/2020 0 0 12 QTE 8 0701-09/30/20	No Violations Or Violations Or The state of the state o	Or Compliance Issues W. Compliance Issues W. QTR 10 QUR-03/31/25 No Violation	### SWere Found Data Last Refreshed	QTR 1 07/01-09 No Viola
Pliance Statute CAA CWA CWA RCRA PEC - Year Violati Type	Summary Data 2 **Compliance Hist **Pregram/Poliutant/Violation Facility-level Status HPV History Ion Assay Pregram Pregram Research Resea	Source II UT0000004904 UTND000 UTU0018 UTD981552 COTY by (Type	CCAMno CC	QTR 2 01/01-03/31/23 No Violation	Current SNC/HPP No No No No No No No No No	ncial Record Review pliance Evaluation Inspectio f	Current As Of 07/19/2025 03/31/2025 03/31/2025 07/19/2025 QTR S 10/01-12/31/23 No Viciation	State State	Qtrd Qtrd Qtrd Qtrd Qtrd Qtrd Qtrd Notice020024	10-07/2020 99/09/2020 0 0 12 QTE 8 0701-09/30/20	No Violations Or Violations Or The state of the state o	Or Compliance Issues W. Compliance Issues W. QTR 10 QUR-03/31/25 No Violation	### SWere Found Data Last Refreshed	QTR 1 07/01-09 No Viola Identif
ppliance statute CAA CWA CWA RCRA CW-Year te Violati Type	Compliance Hist Program/Pollutant/Violation Pagen/Pollutant/Violation Programs Progr	Source II UT0000004904 UTND000 UTU0018 UTD981552 LOTY by (Type Pollutantri QTR 1 04/01-06/30/22	CCAMnio D D D D D D D D D D D D D	QTR 2 1 01(01-03/31/23 Revivation Identified QTR 3 2 10(01-12/31/22	Final Com Corrent SAC/HPP No No No No No No QTR 3 o4(1-05/30/7) identified QTR 4 o1(10-07/30/7)	ncial Record Review gliance Evaluation Inspectio f	Current As Of 01/15/2025 03/11/2025 03/11/2025 07/15/2025 07/15/2025 QTRS 100%-12/21/23 QTRS 07/16/20/25 07/16/20/25	\$100 \$100 \$100 \$100 \$100 \$100 \$100 \$100	Qtrs	10 07/2020 s with MC [of 12] 0 0 12 OTR 8 01045-04/30/20	No Violations Or Violations Or \$ QTR 9 1008.20[31]24 No Violations Selectified QTR 10 QTR 10 GTR 10 GTR 10	Or Compliance Issues W QTR 10 QTR 10 QUA-0331/25 No Violation Selectified	3. Wore Found Data Last Refreshed of 1/18/2025	QTR 1
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ppliance statute CAA CWA RCRA	Compliance Hist Pregram/Patient/Violation (Seurce 10: UT00004000004) Pacility-Level Status HPV History Ion Agency Programs Type Ion Special Complexity (Programs Type Ion Special Comple	Source II UT0000004904 UTND000 UTU0018 UTU091552 COTY by (Type Pollutantx QTR 1 04/01-06/30/22 No Violation	CCAMnio CC	QTR 2 2 01/0-0/3/2/3 No Viciation identified QTR 3 2 10/03-2/2/1/22 No Viciation	Current SNC/HPPI No No No No No No QTR3 e4/01-06/20/20/A QTR4 QTR4 QTR4 No Violation	ncial Record Review gliance Evaluation Inspectio gra 4 gra 4 gra 4 gra 4 gra 4 gra 4 gra 5 levidation	Current As Of 07/19/2025 03/21/2025 03/21/2025 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/2000 07/19/20	State State State T QTR 6 61/92-92/1/24 Not Violation Identified QTR 7 1001-127/1/123	Qtrs 7 Qtrs 7 Qtrs 7 Qtrs 7 Qtrs 2 Qtrs 3 Qtrs 4 Qtrs 3 Qt	10 07/2020 s with NC (of 22) 0 0 12 QTR 8 07/24-92/00/24 Ne Vicinitine Identified	Mo Violations Or Violations Or \$\frac{1}{4}\$ QTR 9 1003-1221/14 Ibe Violations described QTR 10 QTR 10 GTR 10	Or Compliance Issues W Compliance Issues W QTR 10 QQR 9371125 Iba Violation QTR 11 1091-12721747 Iba Violation	Were Found Data Last Refreshed 07/18/2025	QTR: 07/01-09 No Viol. Identi QTR1:
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RCRA	PCR: Permit Condition or Requirement	UT	09/16/2022	-	-	08/16/2023					
RCRA	262.A: Generators - General	UT	09/16/2022	-	-	09/16/2023					
RCRA	268.A: LDR - General	UT	09/16/2022	-	-	09/16/2023					
RCRA	268.A: LDR - General	UT	09/16/2022	-	-	09/16/2023					
RCRA	XXS: State Statute or Regulation	UT					12/20/2023	01/31/2024			
RCRA	XXS: State Statute or Regulation	UT					12/20/2023	01/31/2024			

Informal Enforcement Actions Last 5 Years 💠

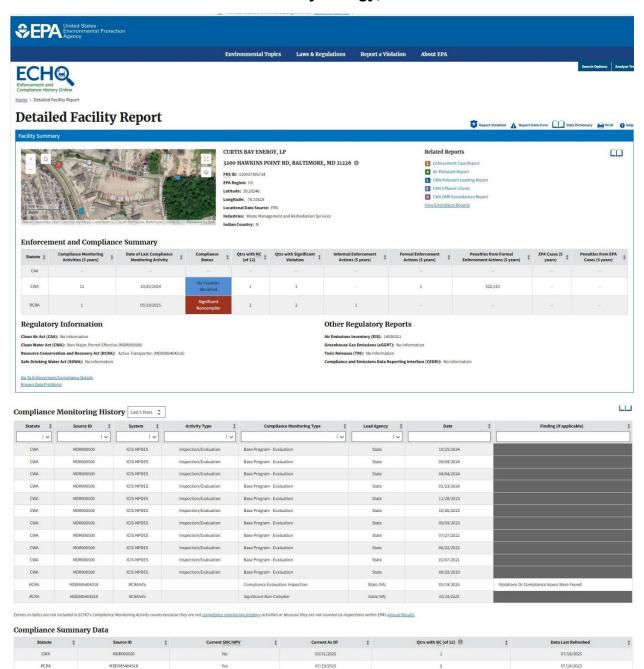
Statute ‡	System ‡	Source ID ‡	Type of Action ‡	Lead Agency ‡	Date ‡
RCRA	RCRAInfo	UTD981552177	WRITTEN INFORMAL	State	03/19/2024
RCRA	RCRAInfo	UTD981552177	VERBAL INFORMAL	State	01/31/2024
RCRA	RCRAInfo	UTD981552177	WRITTEN INFORMAL	State	07/19/2023

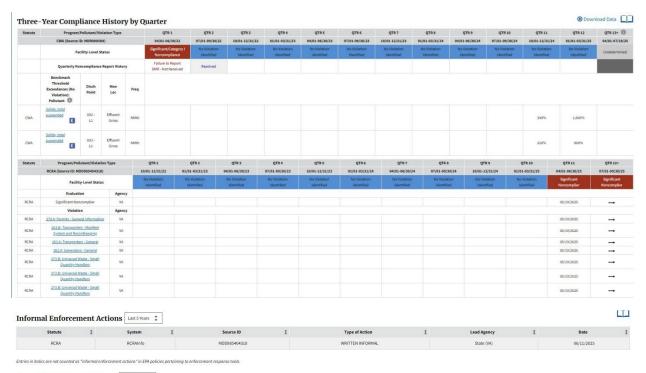
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RCRA	RCRAInfo		RCRAINFO/UTD981552177	RELEASE OF NOTICE OF VIOLATION		State			1	08/24/2021	\$0	\$80,630	-	-	
RCRA	RCRAInfo		RCRAINFO/UTD981552177	INITIAL 3008(A) COMPLIANCE		State			1	03/26/2021	\$0	-		3	

Clean Harbors Environmental Services, Inc.

Address	Finding
	1 reported case closed on 7/16/2024 Case# MA-2024-0054-US1624

Curtis Bay Energy, LP

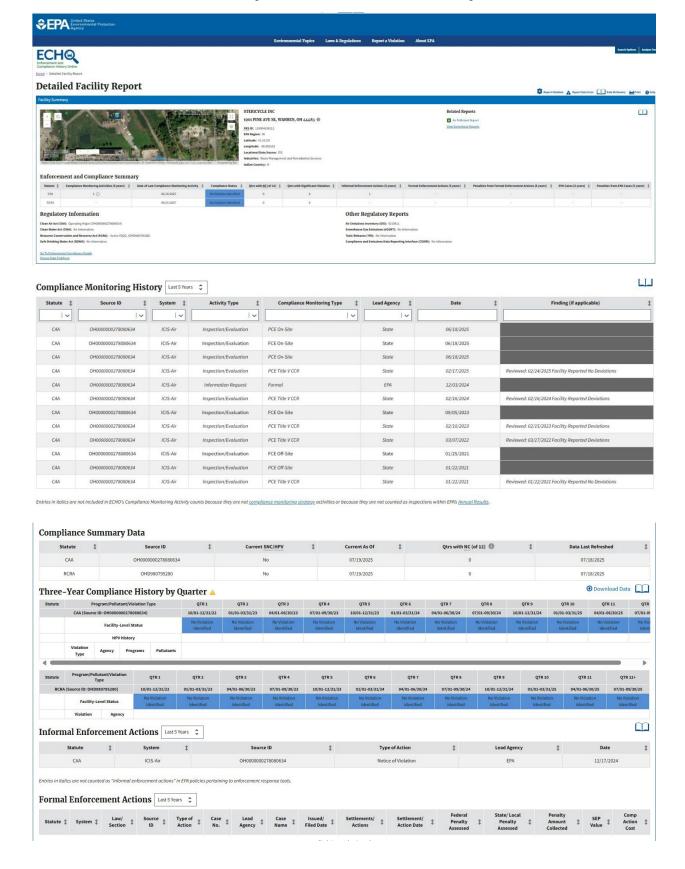




Formal Enforcement Actions Last 5 Years \$...

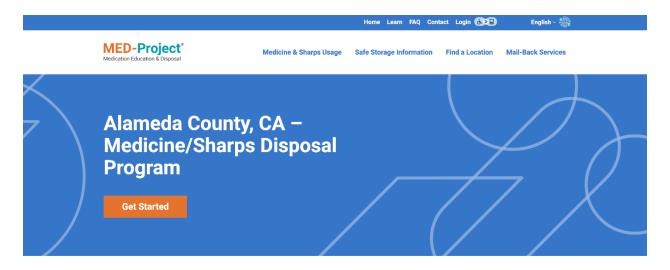
Statute \$\frac{1}{2}\$ System \$\frac{1}{2}\$ Laws \$ Source ID \$\frac{1}{2}\$ Type of Action \$\frac{1}{2}\$ Case No. \$\frac{1}{2}\$ Lead Agency \$\frac{1}{2}\$ Mane \$\frac{1}{2}\$ Issued/Filed \$\frac{1}{2}\$ Settlements/ \$\frac{1}{2}\$ Actions \$\frac{1}{2}\$ Settlements/ \$\frac{1}{2}\$ Penalty Assessed \$\frac{1}{2}\$ Penalty Assessed \$\frac{1}{2}\$ Penalty Assessed \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Conformal \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Composition \$\frac{1}{2}\$ Conformal \$\frac{1}{2}\$ Composition \$\frac{1}{

Stericycle Inc. Warren Ohio Facility



Appendix F

Sample MED-Project Website Pages



What should you do with your unwanted household medication and sharps?

Medicine helps treat disease, manage chronic conditions, and improve health and well-being for millions of Americans.

Take medication as directed by your health care provider and as indicated on the label or packaging, then store it securely, and dispose of it safely, to prevent accidental ingestion or misuse by others, including children and pets. Always be sure to store sharps securely to prevent accidental sticks or misuse by others, and dispose of sharps safely.

MED-Project's disposal services for your unwanted household medication or sharps are safe, convenient, and free.

Learn more about the program









Safe Storage Information



Find a Location





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Medicine & Sharps Usage



If there are any specific instructions on the label, package, or package insert, please follow those instructions.

Adhering to your medication routine means taking your medicine as directed or as prescribed - the right dose, at the right time, in the right way and frequency.

Sharps is a medical term for devices with sharp points or edges that can puncture or cut skin. They may be used at home, at work, and while traveling to manage the medical conditions of people or their pets, including allergies, arthritis, cancer, diabetes, hepatitis, HIV/AIDS, infertility, migraines, multiple sclerosis, osteoporosis, blood clotting disorders, and psoriasis.

Never dispose of medication or sharps down the sink or toilet and do not place sharps in the trash or recycling. Doing so may put waste management and sewage workers, custodians, housekeepers, household members, and children at risk of being harmed.

If you have questions about any medication or your health, please contact your healthcare provider.





Medicine & Sharps Usage



Safe Storage Information



Mail-Back Services

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Medicine & Sharps Usage

Safe Storage Information

Find a Location Mail-Back Services

Safe Storage Information



It is important to take medication as prescribed by your health care provider and as indicated on the label or packaging.

Always be sure to store medicine securely to prevent accidental ingestion or misuse by others, especially children. If you have expired or unwanted household medication, proper storage and disposal are easy.

To protect your family, pets, and community, follow these instructions for secure storage and safe disposal.

Use as Directed

Use medication as directed. If there are any specific instructions on the label, package, or package insert, please follow those. If you have any questions,

Store Securely

Follow storage instructions as provided on medicine labels and on the information accompanying medicine. Keep medication in a secure location safely away from people or pets that might come in contact with them.

Check your medicine cabinet and remove all expired and unwanted medication. If you do not know if a drug is still safe, check with your pharmacist. Count medication to keep track of amounts. Drop off or mail back expired or unwanted medications for safe disposal.

Please separate and remove any items and medication that are not accepted before disposing.

Do not place medicine in the trash or recycling and never flush them down the sink or toilet.

To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.



Medicine & Sharps Usage



Safe Storage Information





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Medicine & Sharps Usage Safe Storage Information Find a Location

Home Learn FAQ Contact Login ♣>₽



Convenient Locations ▼ What Can I Dispose Of? ▲ Location Services ▲



Convenient Locations

 $\label{thm:mediations} \mbox{MED-Project provides safe, free, and convenient disposal options for household medications and sharps in your and the same property of the same pr$ community. Find a location for services near you.

Your Coverage Area

Enter your zip code to find a convenient location near you.



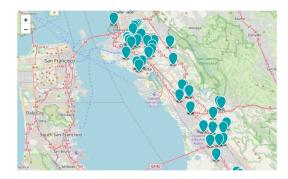
Filter Results

Select All

✓ Medication Drop Box

Sharps Drop Box

Sharps Mail-Back Information



Location Information

CVS Pharmacy 09622

243 West Jackson Street Hayward, CA 94544

Get Directions

(510) 783-0330

Hours of Operation

Services Provided ① Medication Drop Box Sharps Drop Box

Sunday 10:00 AM - 6:00 PM Monday Tuesday 9:00 AM - 8:00 PM 9:00 AM - 8:00 PM

Wednesday 9:00 AM - 8:00 PM
Thursday 9:00 AM - 8:00 PM
Friday 9:00 AM - 8:00 PM
Saturday 10:00 AM - 6:00 PM

CVS Pharmacy 09678

1500 First Street Livermore, CA 94550

Get Directions (925) 455-5580

Services Provided ① Medication Drop Box Sharps Drop Box

Hours of Operation Sunday 10:00 AM - 6:00 PM Monday 9:00 AM - 9:00 PM Tuesday 9:00 AM - 9:00 PM

Wednesday 9:00 AM - 9:00 PM
Thursday 9:00 AM - 9:00 PM
Friday 9:00 AM - 9:00 PM
Saturday 10:00 AM - 6:00 PM

Load More Results



Medicine & Sharps Usage





Find a Location



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Medicine & Sharps Usage Safe Storage Information Find a Location

Mail-Back Services

Find A Location

Convenient Locations ▲ What Can I Dispose Of? ▼ Location Services ▲



What Can I Dispose Of?

Below are general guidelines for the products that will and will not be accepted in drop boxes.

To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.

Residents may also go to selected locations to request a Mail-Back Package for expired or unwanted medicine.

Medications in any dosage form, except for those listed below, in their original container or sealed bag are accepted.

Not Accepted

- Herbal remedies
- Vitamins
- Supplements
- Cosmetics
- Other personal care products

- Empty medical devices
- Batteries
- · Mercury-containing thermometers
- Sharps

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

Do not place medicine in the trash or recycling, and never flush them down the toilet.

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 medicines) contained in U.S. Food and Drug Administration-cleared sharps containers.

Not Accepted

- · Controlled substances (such as opioids)
- · Unwanted medicines not contained in sharps
- 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.



Medicine & Sharps Usage



Safe Storage Information



Find a Location



Mail-Back Services

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Medicine & Sharps Usage Safe Storage Information

Find a Location Mail-Back Services

Find A Location

Convenient Locations ▲ What Can I Dispose Of? ▲ Location Services ▼



Location Services

See descriptions of our services below.



Medication Drop Box

Medication drop boxes are installed at nearby locations such as pharmacies and law enforcement offices for residents to simply drop off their expired or unwanted household medication for safe, free, and convenient disposal.



Sharps Drop Box

Sharps drop boxes are installed at nearby locations such as pharmacies and law enforcement offices for residents to simply drop off $their household \ sharps \ in \ an \ approved \ sharps \ container \ for \ safe, free, \ and \ convenient \ disposal.$



Sharps Mail-Back Information

Information on mail-back disposal services for sharps is available throughout your community at nearby locations, such as pharmacies and law enforcement offices for residents, to inform residents how to request Mail-Back Packages.

NOTE: Not all services are available at each location. Visit the Find a Location page to find out what services are available at a specific collection site.



Medicine & Sharps Usage



Safe Storage Information





Mail-Back Services

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Medicine & Sharps Usage Safe Storage Information Find a Location Mail-Back Services

Mail-Back Services



* Required field

MED-Project provides the following different types of Mail-Back Packages at no charge to residents.

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. Please submit separate forms for each type of mail-back package.

To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.

Name *	Last Name *		
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ot #, Building #, Suite #			
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not accepted below, in their original container or sealed bag are accepted. Not Accepted: - Herbal remedies - Vitamins - Cosmetics - Sharps - Batteries - Illicit drugs - Inhalers If transferring medications to a sealed bag, please be sure to	devices used delivery of my Administration Not Accepted Controlle unwante loose sh Administr	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 are accepted. Not Accepted: Controlled substances unwanted medicines not contained in sharps loose sharps that are not contained in U.S. Food and Drug Administration-cleared sharps containers Please separate and remove any items that are not accepted before disposing. View Sharps Mail-Back Package Insert	
recycle remaining packaging. Do not place medicine in the trash or recycling, and never flush them down the toilet. View Medication Mail-Back Package Insert	before dispos	sing.	
Do not place medicine in the trash or recycling, and never flush them down the toilet.	View Sharps. Accepted: Accepted:	Mail-Back Package Insert I Injectors Back Packages can only be used for pre-filled ucts.	









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Medication Mail-Back Package Insert



Medication Mail-Back Package

The following items are NOT accepted in Medication Mail-Back Envelopes:

 $Herbal\ remedies, vitamins, cosmetics, batteries, mercury-containing\ thermometers, sharps, illicit\ drugs, and\ inhalers.$

To learn more about items that are not accepted in your area, visit <u>med-project.org</u>.

Please separate and remove any items and medication that are not accepted before disposing.

To protect your privacy, patients are reminded to remove all personally identifiable information on prescription labels or materials before disposal.

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

For more information about the MED-Project program:

Please visit med-project.org or call 1-844-MED-PROJECT 1-844-633-7765 (TTY: 711)









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Inhaler Mail-Back Package Insert



Inhaler Mail-Back Package

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

Please separate and remove any items and medication that are not accepted before disposing.

To protect your privacy, patients are reminded to remove all personally identifiable information on prescription labels or materials before disposal.

For more information about the MED-Project program:

Please visit med-project.org or call 1-844-MED-PROJECT 1-844-633-7765 (TTY: 711)







Safe Storage Information



Find a Location



Mail-Back Services

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Injector Mail-Back Package Insert



Injector Mail-Back Package

Injector Mail-Back Packages can only be used for pre-filled injector products and cannot be used for inhalers, controlled substances (such as opioids), or other types of unwanted medicine or items.

Please separate and remove any items and medication that are not accepted before disposing.

For more information about the MED-Project program:

Please visit med-project.org or call 1-844-MED-PROJECT 1-844-633-7765 (TTY: 711)











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Learn



Outreach and Education

Part of MED-Project's mission is to reach out to the local community and educate residents about the proper disposal of unwanted household medication and sharps.

Medicine helps treat disease, manage chronic conditions, and improve health and well-being for millions of Americans.

Take medication as directed by your health care provider and as indicated on the label or packaging, then store it securely, and dispose of it safely, to prevent accidental ingestion or misuse by others, including children and pets. Always be sure to store sharps securely to prevent accidental sticks or misuse by others, and dispose of sharps safely.

MED-Project's disposal services for your unwanted household medication or sharps are safe, convenient, and free.



Brochure - Medicine Program

View Brochure Content



Brochure - Sharps Program



Frequently Asked Questions



Video Public Service Announcement (PSA) - Medicine & Sharps Program

Watch PSA



Survey Information & Results - Unwanted Medicine



Survey Information & Results - Sharps

View Survey

Login to your account to order brochures or view signage.

If you would like any of the unwanted Medicine Program materials emailed to you, contact: alameda@med-project.org.

If you would like any of the Sharps Program materials emailed to you, contact: alamedasharps@med-project.org.



Medicine & Sharps Usage



Safe Storage Information



Find a Location



Mail-Back Services

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Brochure - Medicine Program



Outreach and Education

Part of MED-Project's mission is to reach out to the local community and educate residents about the proper disposal of unwanted household

Are You Done With Those?

Safe and Free Medication Disposal. We Make it Easy for You!

What should you do with your expired or unwanted medication?

Medicine helps treat disease, manage chronic conditions, and improve health and well-being for millions of Americans. Adhering to your medication routine means taking your medicine as directed by your healthcare provider or as indicated on the label or packaging—the right dose, at the right time, in the right way. Then, store it securely, and dispose of it safely, to prevent accidental ingestion or misuse by others, including children and pets.

MED-Project programs and services make it safe, free, and convenient for you to dispose of medication.

Use medication as directed. If there are specific instructions on the label, package, or package insert, please follow those instructions. If you have any questions, ask your health care providers.

Follow storage instructions as provided on medicine labels and the information accompanying the medicine. Keep medications in a secure location, safely away from people or pets.

Check your medicine cabinet and remove all expired and unwanted medication. If you do not know if a drug is still safe, check with your pharmacist. Count medication to keep track of amounts. Drop off or mail back expired or unwanted medications for safe disposa

Disposal of Household Medication

MED-Project provides safe, free, and convenient disposal options for household medications in your community.

Conveniently located drop boxes are available in your area. To find a drop box near you, visit the Find a Location section of med-project.org.

Mail-back packages are available in your area. All mail-back packages are pre-addressed with postage pre-paid. To order a Mail-back package, visit the Mail-Back section of med-project.org

MED-Project may have mail-back package distribution or informational sites in your area.

To find out more about the disposal options in your area, visit med-project.org.

To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medication

What items can I dispose of in a drop box?

Please separate and remove any items and medication that are not accepted before disposing.

Accepted: Medications in any dosage form, except for those identified as Not Accepted below, in their original container or sealed bag.

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

NOT Accepted: Herbal remedies, vitamins, cosmetics, batteries, mercury-containing thermometers, sharps, and illicit drugs.

To learn more about items that are not accepted in your area, visit med-project.org.

For more information about the MED-Project Program, visit www.med-project.org or call 1 (844) MED-PROJECT or 1 (844) 633-7765 (TTY: 711).

For easy-to-use and easy-to-locate medication 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 companies participating in the MED-Project Product Stewardship Program.

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Frequently Asked Questions



General Questions	
What is 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 my pet has ingested medication?	~
What should I do if I think I or someone in my household has been stuck by a used sharp?	~
Where can I find information about California's Prop 65?	~
Where are the MED-Project disposal locations nearest me?	~
Medicine and Sharps Program Questions	
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?	~
How do I dispose of my expired or unwanted medicine or sharps?	~
Should I remove my personal information before disposing of my medication or sharps?	~
Will it cost me anything to dispose of my medication or sharps?	~
Can I flush my medication or sharps down the toilet?	~
What items can I dispose of in a MED-Project drop box?	~
Where else can I find information about the safe disposal of unwanted household medication or sharps?	~
What is recommended for safe disposal of expired or unwanted household medication and/or sharps in Alameda County?	~
I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?	~
Where can I find more information on the Alameda County Safe Drug Disposal Ordinance?	~









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Medicine & Sharps Usage Safe Storage Information Find a Location Mail-Back Services

Learn



Outreach and Education

Part of MED-Project's mission is to reach out to the local community and educate residents about the proper disposal of unwanted household medication and sharps.











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Contact



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 or (TTY: 711)

For answers to some frequently asked questions, visit the MED-Project FAQ page.

Convenient Locations

If you are a current drop box site, or a retail pharmacy, hospital/clinic with an onsite pharmacy or a law enforcement agency interested in hosting a drop box, please contact us:

Login or Register for an Account

Call us by Phone:

1 (833) MED-PROJECT or 1 (833) 633-7765

Fax us:

1 (866) 633-1812

Oakland, CA 94611

Email us:

Email Inquiries for Medicine Disposal: alameda@med-project.org

Email Inquiries for Sharps Disposal:

alamedasharps@med-project.org

Address:

Dr. Victoria Travis, PharmD, MS, MBA National Program Director MED-Project, LLC 4096 Piedmont Ave - Unit 174

Convenient Locations/Host Sites -Request Materials

Login to your account to <u>order brochures</u> or contact us at 1 (833) MED-PROJECT or 1 (833) 633-7765.

If you have any questions, comments, or concerns, login to your account.

Drug Producers

If you are drug producer interested in participating in the MED-Project Stewardship Plan contact:

Phone: 1 (202) 495-3131

Sharps Producers

If you are a sharps producer or a producer of medications usually injected outside of a healthcare setting and sold in the jurisdiction and are interested in participating in a MED-Project Product Stewardship Plan, please contact:

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

If you are experiencing a medical emergency, please dial 911. If you are experiencing a non-emergency but suspect that you or another individual has ingested something poisonous, please call Poison Control at 1 (800) 222-1222.

If you have questions about your medication, please call your health care provider.



Medicine & Sharps Usage



Safe Storage Information



Find a Location



Mail-Back Services

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Appendix G

Sample Bi-Fold Brochure

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> For more information about the **MED-Project Program**

MED-Project® Medication Education & Disposal

Are You Done With Those?

Safe & Free Medication Disposal We Make it Easy for You!













(844) 633-7765 (TTY: 711) For easy-to-use and easy-to-locate medication disposal!

Visit med-project.org or call (844) MED-PROJECT

med-project.org

What should you do with your expired or unwanted medication?

Medicine helps treat disease, manage chronic conditions, and improve health and well-being for millions of Americans. Adhering to your medication routine means taking your medicine as directed by your healthcare provider or as indicated on the label or packaging—the right dose, at the right time, in the right way. Then, store it securely, and dispose of it safely, to prevent accidental ingestion or misuse by others, including children and pets.

MED-Project programs and services make it safe, free, and convenient for you to dispose of medication.

Use as Directed

Use medication as directed. If there are specific instructions on the label, package, or package insert, please follow those instructions. If you have any questions, ask your health care providers.



Store Securely

Follow storage instructions as provided on medicine labels and the information accompanying the medicine. Keep medications in a secure location, safely away from people or pets.



Dispose Safely

Check your medicine cabinet and remove all expired and unwanted medication. If you do not know if a drug is still safe, check with your pharmacist. Count medication to keep track of amounts. Drop off or mail back expired or unwanted medications for safe disposal.

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