

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH SAFE DRUG DISPOSAL DRUG STEWARDSHIP PLAN

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As Revised on March 4, 2022



SUBMITTED BY:



INMAR.
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I. Introduction

Inmar submits this Product Stewardship Program Plan (“Plan”) for all Unwanted Product, regardless of who produced them, in compliance with the Alameda County Safe Drug Disposal Ordinance 2016 located at Title 6, Chapter 6.53, (“Ordinance 6.53”) and the Alameda County Safe Drug Disposal Regulations, (“Regulations”), for the management, collection, transportation, and disposal of Unwanted Product from the Residents of the Alameda County. All capitalized terms not otherwise defined shall have the same meaning as in Ordinance 6.53 and the Regulations.

Inmar’s Plan will provide a comprehensive safe drug disposal Stewardship Program that will include compliant drug Collection Methods supported by outreach and education Programs to increase Resident awareness and participation. The Plan will provide safe, secure, and convenient access on an ongoing basis for Residents across the County and will be funded by participating covered manufacturers. The Program will also provide reporting on collection metrics and results of Resident education and outreach campaigns.

II. Overview

Inmar’s Plan is compliant with Ordinance 6.53 and the Regulations. The Plan provides for safe, secure and convenient access to Unwanted Covered Drug Drop-off locations on an ongoing basis for Residents across Alameda County and will be funded and paid for in accordance with Ordinance 6.53.040 (B). Inmar’s Plan also meets all requirements specified in Article 9.1 of Title 16 CCR Division 17 for Prescription Drug Take-Back Services (“BOP Article 9.1”). Inmar’s Plan will accept all Unwanted Covered Drugs regardless of who produced them and there will be no point-of-sale or point-of-collection fee charged to residential generators.

Pursuant to the Regulation, § 7, Inmar’s Plan includes the following components:

- **General Information:** Plan Participants, Inmar coordinator information, website and telephone information;
- **Collection Components:** A description of the collection systems to provide convenient ongoing collection service for all Unwanted Products in accordance with the Regulation § 7 (D);
- **Transporter & Disposal Information:** A description of the transportation and disposal systems to be used in accordance with the Regulations § 7 (E) & (F) and the Ordinance 6.53.060;
- **Policies and Procedures:** A description of the policies and procedures to be followed by Persons handling Unwanted Covered Drugs;
- **Patient Privacy:** A description of how patient information on Drug packaging will be handled;
- **Public Education & Promotion:** A description of Inmar’s public education outreach and promotion strategy required in the Regulation § 7 (G) and the Ordinance 6.53.070, including a copy of standardized instructions for Alameda County Residents, signage developed for Collection Points and required promotional materials;
- **Plan Goals:** A proposal as to Inmar’s short-term and long-term goals under the Plan in accordance with the Regulations § 7 (H);
- **Reporting:** A description of the annual reporting Inmar will provide pursuant to the Regulation § 15 and the Ordinance 6.53.080; and
- **Miscellaneous:** Separating Covered Drugs from packaging where possible and recycling of Drug packaging where feasible.

As required in the Ordinance 6.53.050 (B) (6), Inmar will submit any proposed changes, other than collection of non-prescription covered drugs, to the Department in writing for approval, prior to implementation of any changes.

III. Definitions – the following is a list of definitions for terms used other than those terms defined in the Ordinance and Regulations:

Auto-injector (or Auto Injector) means an unused or partially used Pre-filled Injector Product with a retractable or otherwise securely covered needle.

Auto-Injector Mail-Back Package means a pre-paid, pre-addressed, FDA-cleared Sharps Container and outer shipment Package for the collection and disposal of Pre-filled Injector Products.

Authorized Collector means the operator of a Collection Point.

Board of Pharmacy means the California State Board of Pharmacy.

Carrier means the common carrier used to transport Unwanted Covered Drugs.

Container means the cardboard box which both supports the Inner Liner inside the Kiosk during medicine collection and becomes the outer shipping Package when the Inner Liner is full and/or removed from the Kiosk.

Collection Point means a location which hosts an Inmar Kiosk for the collection of Unwanted Covered Drugs and is operated by an entity which has registered with the DEA as an Authorized Collector of Controlled substances under 21 CFR Section 1317.

Collection System is Inmar's term for the Collection Method that utilizes permanent Collection Kiosks at fixed locations.

Collection Method means one of the three Collection types (Kiosk, Mail-Back, or Event) authorized for collection and disposal of home-generated Controlled substances by the DEA under 21 CFR Section 1317.

DEA means the U.S. Drug Enforcement Administration.

DEA Rule means the DEA Final Rule, "Disposal of Controlled Substances," 79 Fed. Reg. 53520 *et seq.* adopted on September 9, 2014 and codified at 21 CFR 1317.

DOT means the U.S. Department of Transportation.

Drop-door means the door on the Kiosk where Unwanted Covered Drugs are deposited by Residents.

Inhaler Mail-Back Envelope (Envelopes) means a pre-paid, pre-addressed envelope for the collection and disposal of inhalers.

Inmar Plan means the Product Stewardship Plan presented in this submittal.

Inner Liner means the liner placed inside the Container which meets the requirements of 21 CFR Section 1317.60.

Kiosk means a metal receptacle into which Residents deposit Unwanted Covered Drugs and which meets the requirements of 21 CFR Section 1317.

Kiosk Drop-off Service means a Collection Method in which Residents deposit Unwanted Covered Drugs into a Kiosk operated by an Authorized Collector at an Authorized Collection Site.

Liner Kit is a set of three (3) pre-labeled and pre-paid cardboard box Containers, liquid barriers, and serialized, puncture-resistant Inner Liners.

Law Enforcement Agency or LEA is a Federal, State, tribal, or local law enforcement office or agency.

Mail-Back Service means a Collection Method in which Residents return Unwanted Covered Drugs utilizing prepaid and pre-addressed Mail-Back Envelopes or Packages.

Mail-Back Starter Kit means 20 Standard Mail-Back Envelopes with a visual reorder trigger, with instructions to Standard Mail-Back Distribution Sites on how to reorder additional Mail-Back Starter Kits.

Mailer is Inmar's generic term used to refer to all pre-paid, pre-addressed Standard and Inhaler Mail-Back Envelopes and Auto-Injector Mail-Back Packages.

Non-participating means qualified entities not participating in an existing Approved Stewardship Plan as of February 11, 2021.

Packaged Container means the full Inner Liner used in the Kiosk Drop-off Service after it is removed, secured within the Container, prepared, and sealed for transportation to a DEA Reverse Distributor.

Pharmacy Employee means the designated contact person or persons at the Kiosk Drop-off Site.

Pick-Up and Disposal Coordination Option means the method of Packaged Container disposal which an Authorized Collector selects when participating in the Inmar Plan. The three options, Self-Service Return, Technician-Assisted Return, and Full-Service Return, are described in detail in Section V (c) of the Inmar Plan.

Required Languages means English, Spanish, Chinese, Vietnamese, and Tagalog (Filipino).

Residents means human beings residing in the County of Alameda. "Residents" does not include business generators of pharmaceutical waste, such as hospitals, clinics, doctor's offices, veterinary clinics, pharmacies, or airport security and law enforcement drug seizures.

Standard Mail-Back Envelope Distribution Site means a location at which Residents may obtain one or more standard Mail-Back envelopes at no charge and which is provided by Inmar to meet the Service Convenience Goals established in the Ordinance.

Standard Mail-Back Envelope (Envelopes) means a prepaid and pre-addressed Mail-Back Envelope for the collection and disposal of all Unwanted Covered Drugs except for those dispensed in an inhaler or auto-injector.

IV. General Information

a) Plan Participant(s)

A list of Plan Participants with contact information will be provided to the Department annually. Any change in the Producer Participants will be provided to the Department within 30 days of the change.

b) Inmar Plan Liaison

Inmar Intelligence
 Nick Massaro,
 Manager, Consumer Drug Take Back Solutions
 635 Vine Street
 Winston Salem, NC 27101
 Email: nicholas.massaro@inmar.com
 Phone: 336-770-1992

c) Website

Inmar's Plan website: safemedicinedrop.com

d) Telephone Number

The toll-free number for County Residents to obtain information about Collection Points,

educational materials and other aspects of the Plan is 888-371-0717.

V. Collection Components

A. Convenient and Equitable Access

Pursuant to the Regulation § 7 (D) (i) and Ordinance 6.53.060 (A)-(C), and upon Plan approval, Inmar will initiate operations immediately to establish a system of Collection Points that provide convenient and equitable access to Residents across the County as outlined in the Ordinance. Collection Points are searchable to Residents in Google Maps, simply by typing “Drug Disposal,” or other similar phrases in the Google Maps applications.

Inmar commits to collaboration with the Department to ensure alignment in the proper number and location of Unwanted Product Collection Points. It is Inmar’s intention to engage our existing pharmacy clients to become authorized Collection Points. It is not our intention to duplicate Kiosks that already exist in Plan Operators. Appendix A-1 includes a list of confirmed Authorized Collector Collection Points. Appendix A-2 includes a list of potential Collection Points.

In accordance with the Ordinance 6.53.050 (A) (9), Inmar will correlate the number of Collection Points with the market share of the drugs sold in the County by the Plan Participants in the County. This will result in Inmar placing Kiosks at Collection Points in a proportion equal to or greater than the market share of drugs sold by the Plan Participants.

Inmar is actively in discussions with its existing pharmaceutical returns client network seeking pharmacies interested in becoming Authorized Collectors. Inmar will utilize hospitals with on-site pharmacies and Law Enforcement Agencies as necessary to meet the goals of equitable and reasonably, convenient access for County Residents.

Inmar will review any potential Authorized Collector Site against the California Board of Pharmacy License directory to validate the location holds an active retail, hospital or clinic license. Additionally, Sites will be required to provide evidence of current DEA registration. Inmar will notify the Department as new Collection Points become operational. Such notification will include the Collection Point’s contact information.

To ensure the best possible access for the Residents of the County, Inmar also provides Mail-Back Services and Collection Events which are described in more detail in Section C. In order to establish geographically convenient access to the Kiosks and Mail-Back Sites we will utilize the 2019 census data which shows the incorporated cities and towns in the County. Our goal is to place at least one Mail-Back Distribution Site in each of these cities/towns and one additional for every twenty-five thousand (25,000) Residents. For areas where we are unable to secure a Drop-off Site or a Mail-Back Distribution Site we will work with the local Department to host a Collection Event at least once a year, but will reassess as the Program proceeds and more Drop-off Sites and/or Mail-Back Distribution Sites are operational in the County.

B. Collection Points – Kiosks

Pursuant to the Ordinance 6.53.060 (A) and Regulation § 8 (A) (v), Inmar complies with DEA regulation 21 CFR Parts § 1317.60 (c) and 1317.70 (f) and BOP Article 9.1 and seals all Kiosk Inner Liners and Mail-Back Envelopes. These Inner Liners and Envelopes shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into a Drop-box or Mail-Back Envelope. Patient Privacy is addressed more specifically in Section VIII.

Pursuant to the Ordinance 6.53.050 (A) (11)-(12), Inmar will give preference to Law Enforcement Agencies and retail pharmacies wherever possible to voluntarily serve as Drop-off Sites for Unwanted Covered Drugs. Inmar will work with all Collection Points to validate that the requirements in the Ordinance 6.53 and the Regulations including all relevant DEA and BOP Article 9.1 requirements are met.

Kiosk Specifications and Design

Inmar's Kiosk is made in the USA and designed to be safe and secure as required. Produced from 16-gauge cold-rolled steel, and with an easy-to-use, Americans with Disabilities Act (ADA)-compliant Drop-box design, Residents can easily drop unused medications through the Drop-door and into the shippable Container and Inner Liner. The Container is a 275lb-rated box with a 6-mil, DEA-compliant Inner Liner. Inner liners are either 18 gallons or 35 gallons dependent upon geographical location and population density of the Kiosk location. This volume rating is printed directly onto our 6-mil DEA-compliant Inner Liners and have passed the tests prescribed in accordance with ASTM D 1922 and ASTM D 1709.

The Kiosk design itself exceeds standard security requirements. The top of the Kiosk is sloped, limiting the ability to stack items on top. In addition, the drop slot features an extended metal drop door that lowers into the Container to detect when product capacity is reached. When the drop door encounters resistance within the Kiosk, it is an indication that it is time to change the Container. This manual capacity indicator eliminates the need to change batteries and/or sacrifice the location of the Kiosk to be proximate to an electrical outlet. Lastly, the Container access door is reversible to allow for convenient placement in any appropriate location in the pharmacy.

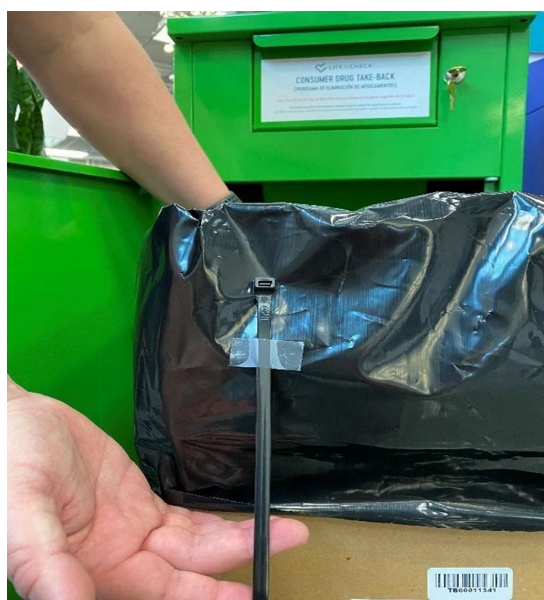
Per DEA requirements, Kiosks will be installed in the line of sight of Pharmacy or DEA registrant Employees and bolted to the floor or a permanent fixture. Inmar's Kiosks have pre-drilled holes in the bottom for easier installation. It also features a 4-point locking system with steel projections in two center locations and the top and bottom of the door that are activated when locked for strengthened security. Top and bottom deadbolt locations are hidden from the outside to prevent break-ins.

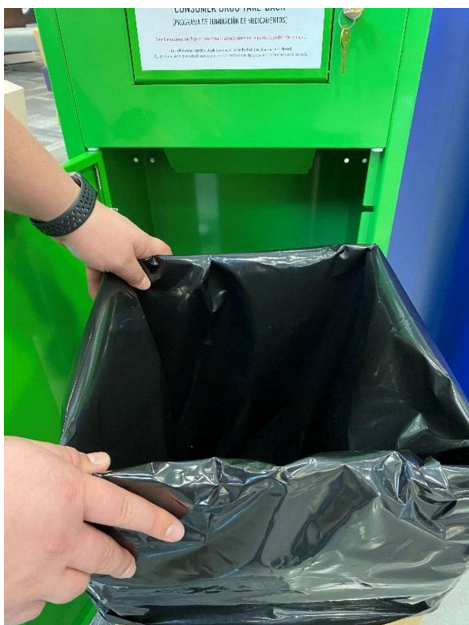
The Inmar Kiosk will have signage that communicates what is and is not allowed to be placed inside. The signage will also feature a website and toll-free telephone number (detailed further in Section VII) so users of the Program can ask questions and find more information. Inmar will work with the Department to design signage that meets the needs and requirements of the Program. See Appendix B for examples of signage.

Inmar's Kiosk is sent to the Authorized Collector along with enough supplies for 3 returns. Supplies include:

- Pre-addressed, pre-paid serialized Container
- Serialized Inner Liners to protect against puncture and provide a liquid barrier
- Easy-to-use zip ties to seal Inner Liner compliantly
- Absorbent pad for placement in the bottom of the Inner Liner bag

Kiosk design features





Pick-Up and Disposal Coordination Options

For the safe on-site removal of contents and servicing of Kiosks, Inmar abides by the DEA regulations in 21 CFR 1300 et al.

Inmar will work with each Authorized Collector to develop a Collection Program schedule that works specifically for their location - either full-service, technician-assisted or self-service option. Inmar will also be at the ready with service technicians should emergency service be required. For a pickup request outside of the normal schedule, the standard response time is 48 hours.

Self-Service Returns

Upon request by Authorized Collectors and upon receipt of approved petition for exception, Inmar will train Authorized Collectors to service the Containers on their own to allow for expedited servicing as they desire. The steps to service a Container are fast, efficient, and DEA-compliant. Inmar will provide Authorized Collectors with training materials including step-by-step instructions for tracking, sealing, shipping, and replacing of Collection Containers. Training materials also include instructions for the scheduling of Kiosk maintenance as necessary. The process for the pharmacy once a Kiosk is installed is as follows:

- Pharmacist receives the Liner Kit
- Pharmacy team (consisting of 2 Pharmacy Employees) constructs the Container with Inner Liner, inserts and securely locks the Kiosk
- Pharmacy team unlocks the Kiosk drop-door to enable consumer use
- Installation date of Inner Liner is documented and witnessed by on Tracking Sheet
- Once Kiosk is full, Pharmacy team members will jointly open Kiosk
- Container and Inner Liner is removed and documented on the Tracking Sheet.
- Container is packaged (Inner Liner is zip tied, outer box is taped) to be compliant with all DOT Hazardous Materials Regulations
- The sealed Inner Liner will not be opened, x-rayed, analyzed, or otherwise penetrated
- Replacement Container and Inner Liner is constructed, inserted, secured into Kiosk and documented on the Tracking Sheet

- Pharmacy team contacts FedEx for pickup of Packaged Container for shipping to authorized Disposal Facility for destruction
- If the Container (and Inner Liner) must be shipped at a later time (shipment cannot take place at time of service), storage of the Container behind pharmacy counter must be notated on the Tracking Sheet
- Replacement Container and Inner Liner is constructed, inserted, secured into Kiosk and documented on the Tracking Sheet
- Visually and physically inspect Kiosk to ensure proper operation. Should maintenance be necessary, refer to Training Materials provided to request service as required
- Kiosk Containers will be sent using Inmar's DOT Special Permit #20499, from the pharmacy location via FedEx to Inmar's third party contractor, 123 Compliant Logistics, LLC, a licensed DEA Reverse Distributor-Collector.
 - 123 Compliant Logistics will record the following information upon receipt of every individual Container:
 - Date received
 - Serialized barcode label information
 - FedEx Tracking information
 - Weight
 - Date transported to Disposal Facility
 - Disposal date
 - Manifest number
 - All information recorded will be transferred back to Inmar on a daily basis as part of the electronic raw data file via SSH File Transfer Protocol (SFTP). Any discrepancies observed at 123 Compliant Logistics will be recorded on discrepancy reports to prompt any corrective action.
 - All product shipped directly to 123 Compliant Logistics will be transported using their contracted, licensed hazardous waste transporter, TransChem Environmental, to the appropriate Disposal Facility to be incinerated quickly, securely, efficiently and in accordance with all DEA requirements. 123 Compliant Logistics will be responsible for all DEA Form 41 record keeping requirements.

*At no point will the pharmacy have to store the filled Container for longer than 48 hours after calling FedEx.

As part of the self-service option for Kiosk servicing, the pharmacist will be responsible for packaging the Container and Inner Liner for shipment and contacting FedEx for pickup. Typically, FedEx responds within 48 hours of request by phone. If the pharmacist utilizes the FedEx shipping portal, the pharmacist is able to request in the "Notes" field a specific pick-up time. Inmar will also reach out to its contacts at FedEx to ensure that local contacts are aware of Authorized Collection Sites and their needs related to quick turnaround.

Technician-Assisted Returns

Inmar will provide contracted employees who will be trained specifically in servicing Kiosks in a geographically-assigned area. These employees will establish a pattern for servicing the Authorized Collectors utilizing service metrics to establish an appropriate pattern of service. The service will include the following:

- Observation of the condition of the receptacle upon arrival
- Notification to the Pharmacy Employee of arrival
- Coordination of 2 Pharmacy Employees to witness change out of Container (and Inner Liner)
- Removal, packaging, and documentation of the Inner Liner and Container from the Kiosk

- Replenishment of new supplies for renewed operation
- General clean-up and wipe down of Kiosk
- Notation of Inner Liner serial number removed, and replacement Inner Liner serial number installed along with signatures by 2 Pharmacy Employees (witnesses)
- Removal of Packaged Container to be placed behind the pharmacy counter to await FedEx pick up
- Technician calls FedEx to schedule pickup of the Packaged Container unless otherwise agreed upon by Pharmacy Employees in writing
- Final signature from Pharmacy Employees of completion of service event.
- Kiosk Containers will be sent using Inmar's DOT Special Permit #20499, from the Pharmacy location via FedEx to Inmar's third party contractor, 123 Compliant Logistics, LLC, a licensed DEA Reverse Distributor-Collector.
 - 123 Compliant Logistics will record the following information upon receipt of every individual Container:
 - Date received
 - Serialized barcode label information
 - FedEx Tracking information
 - Weight
 - Date transported to Disposal Facility
 - Disposal date
 - Manifest number
 - All information recorded will be transferred back to Inmar on a daily basis as part of the electronic raw data file via SSH File Transfer Protocol (SFTP). Any discrepancies observed at 123 Compliant Logistics will be recorded on discrepancy reports to prompt any corrective action.
 - All product shipped directly to 123 Compliant Logistics will be transported using their contracted, licensed hazardous waste transporter, TransChem Environmental, to the appropriate Disposal Facility to be incinerated quickly, securely, efficiently and in accordance with all DEA requirements. 123 Compliant Logistics will be responsible for all DEA Form 41 record keeping requirements.

*At no point will the pharmacy have to store the filled Container for longer than 48 hours after calling FedEx.

Full-Service Returns

Inmar will offer on-site service for the collection, replacement, and shipping of full Containers (and Inner Liners). This all-inclusive Program removes the burden for the Authorized Collector and the Pharmacy Employees. Inmar will initiate standard service intervals for each Collection Point. Once a pattern of usage has been established, the service schedule will be adjusted with the agreement of the Authorized Collector to provide the best overall service with minimal interruption. Inmar will work with the Authorized Collector to adjust the schedule based on utilization of the Kiosk.

Inmar will provide two employees with all appropriate DEA and DOT function specific training to specifically service Kiosks. Upon installation of the Kiosk, the process for Full-Service Events will include the following:

- Pharmacist receives the Liner Kit

- Pharmacist contacts preassigned Full Service staff to construct Container with Inner Liner, insert and securely lock Kiosk.
- Full Service staff will unlock the Kiosk drop door to enable consumer use
- Once the Kiosk is full (or until routine schedule is established), pharmacist contacts preassigned Full Service staff service
- Upon arrival, Full Service staff will observe the condition of the Kiosk
- Full Service staff will notify pharmacist of arrival
- Full Service staff will remove the Container and Inner Liner and document on the Tracking Sheet.
- Container is packaged (Inner Liner is zip tied, outer box is taped) to be compliant with all DOT Hazardous Materials Regulations
- The sealed Inner Liner will not be opened, x-rayed, analyzed, or otherwise penetrated.
- Replacement Container and Inner Liner is constructed, inserted, secured into Kiosk and documented on the Tracking Sheet by the Full Service staff
- Full Service Staff will perform general clean-up and wipe-down of Kiosk
- Full Service Staff will unlock the Kiosk Drop-door to enable consumer use
- Installation date of Inner Liner is documented and on Tracking Sheet
- The sealed Inner Liner will not be opened, x-rayed, analyzed, or otherwise penetrated
- Full Container (and Inner Liner) will to be taken directly to FedEx by Full Service staff to be sent directly to authorized Disposal Facility for destruction
- Final signature from pharmacists upon completion of the Full-Service Event is obtained
- Kiosk Containers will be sent using Inmar's DOT Special Permit #20499, from the pharmacy location via FedEx to Inmar's third party contractor, 123 Compliant Logistics, LLC, a licensed DEA Reverse Distributor-Collector.
 - 123 Compliant Logistics will record the following information upon receipt of every individual Container:
 - Date received
 - Serialized barcode label information
 - FedEx Tracking information
 - Weight
 - Date transported to Disposal Facility
 - Disposal date
 - Manifest number
 - All information recorded will be transferred back to Inmar on a daily basis as part of the electronic raw data file via SSH File Transfer Protocol (SFTP). Any discrepancies observed at 123 Compliant Logistics will be recorded on discrepancy reports to prompt any corrective action.
 - All product shipped directly to 123 Compliant Logistics will be transported using their contracted, licensed hazardous waste transporter, TransChem Environmental, to the appropriate disposal facility to be incinerated quickly, securely, efficiently and in accordance with all DEA requirements. 123 Compliant Logistics will be responsible for all DEA Form 41 record keeping requirements.

Auto-Replenishment of Kiosk Supplies

Regardless of service option selected, the supplies used to collect and transport Unwanted Product are provided in automatically-replenished "Kits" of three. Each Kit includes: pre-labeled, pre-addressed and pre-paid cardboard box Containers, liquid barriers and serialized, puncture-resistant Inner Liners. The Kits, when

packaged with the interior components, are approximately 6 inches thick. The Mailer is cinched tightly around the inner components, which makes for a very easy-to-store Kit. Kits can be stored behind the pharmacy counter, behind a door, or under or behind a desk, with no ongoing maintenance required.

Upon receipt of the Container (and Inner Liner) at our destruction partner's site, an electronic raw data file via SSH File Transfer Protocol (SFTP) with the weight, serialized barcoded label information and tracking information is passed to Inmar. This information is then received and entered into our Order Management log and Inbound Receipts log. The system tracks when the second of the three Inner Liners is received at the destruction partner. Inmar then initiates a reorder trigger for the next Kit to be shipped. Auto replenishment reduces the amount of inventory maintained at the Collection Point while maintaining sufficient supplies to keep the Kiosk continuously operable.



C. Mail-Back Services

Pursuant to the Ordinance 6.53.050 (A) (5), Inmar will provide prepaid and pre-addressed Mail-Back Envelopes to Residents containing written instructions for returning unused or unwanted medication. Mail-Back Envelopes will be provided at Mail-Back Distribution Sites and will also be available directly from Inmar via the Program website and toll-free telephone number. Appendix A-3 represents locations identified as targeted Mail-Back Distribution Sites.

Once a location has been accepted as a Mail-Back Distribution Site, Inmar will send a stack of prepaid, pre-addressed Unwanted Covered Drugs Mail-Back Envelopes to that location as a Mail-Back Starter Kit. Mail-Back Envelopes will accept all Unwanted Covered Drugs, including pills, creams and liquids, and schedule II-V Controlled substances. However, inhalers and auto-injectors will require the use of different Mail-Back Packages (described below) and will not be included in the Starter Kit. The Starter Kit will include 20 Mail-Back Envelopes sent to each location. Inmar will track the unique identifier for all Mail-Back Envelopes sent to each location for fulfillment and logistical purposes. Inmar will add a visual reorder trigger in the box of Envelopes. Once the location gets to the reorder trigger in the box, the visual

reorder trigger will instruct the location to email Inmar for another Kit. This service model ensures that there is no 'down time' at the Site for Envelopes. If a location begins to use a larger number of Envelopes, the number of fulfilled Envelopes sent to that location will be increased.

Inmar is committed to providing all pharmacies an option to supply their customers with information regarding Mail-Back Service options. Inmar will provide pharmacies with small cards that can be handed out to County Residents that may need access to this service. The card will instruct them to either call or visit the Program website to locate the nearest Kiosk or request a Mailer. Additionally, we will reach out to pharmacies filling prescriptions by mail to include the cards for the same options.

Requesting Return Envelopes

County Residents will be able to request up to three (3) Unwanted Covered Drug Envelopes at a time via the Program website or toll-free number. County Residents will receive the Unwanted Covered Drug Envelope no later than 10 business days from date of request.

Both the Unwanted Covered Drugs and Inhaler Envelopes will meet DEA rule requirements under § 1317.70(c):

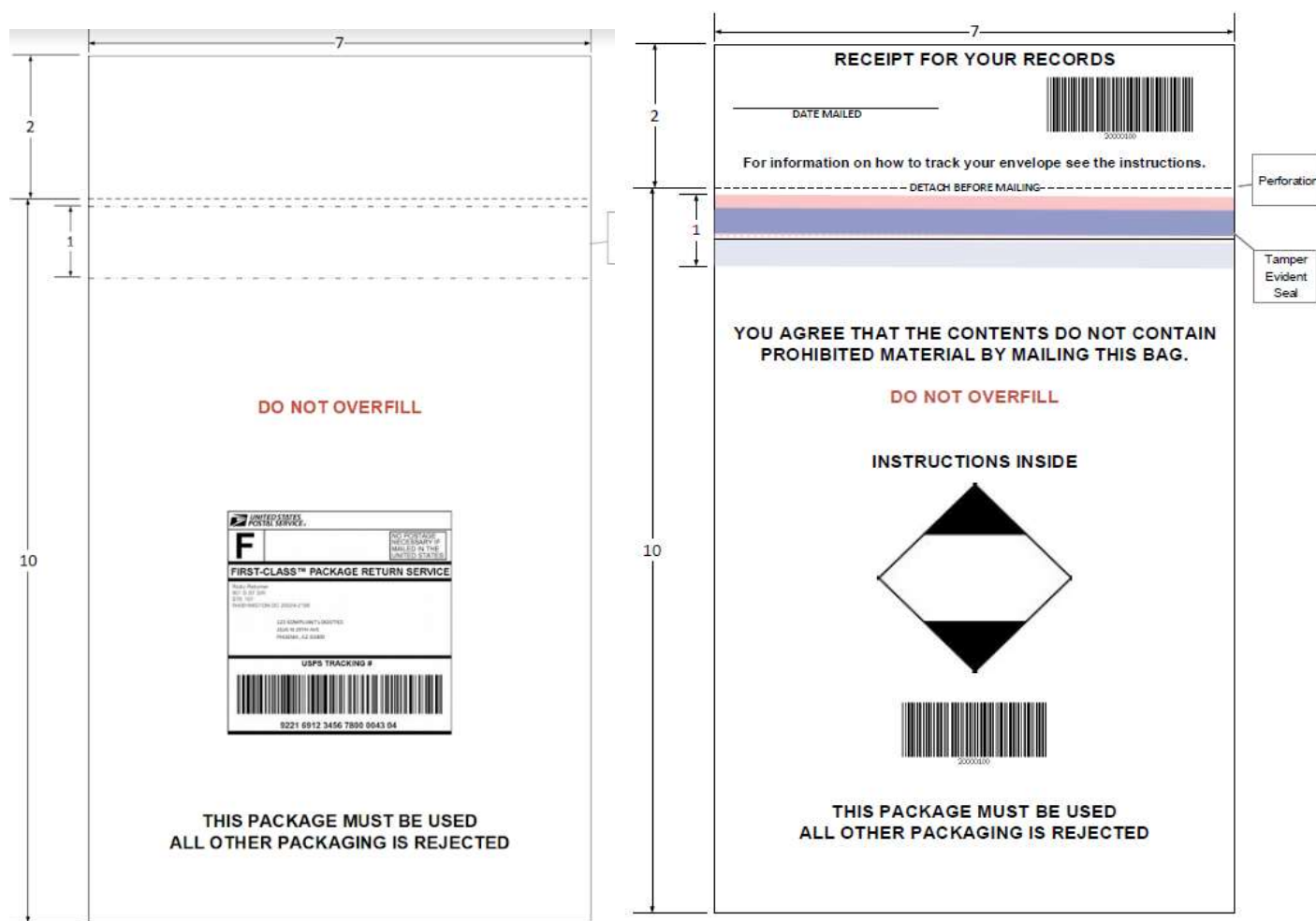
- Pre-addressed, postage paid
- Nondescript, and do not indicate what may be inside
- Waterproof, tamper-evident, tear-resistant, and sealable
- Contain a unique ID number that allows for tracking
- Include instructions for the user that indicate the process for mailing the Package, substances that can be sent, notice that Packages can only be mailed in the US customs territory, and notice that the only Packages provided by the Authorized Collector will be accepted
- No personally-identifiable information will be required

Both Envelopes are white in color with a gray interior and are 7" x 10". The Envelopes include a 3" perforated lip security seal. They are distributed by our third party contractor 123 Compliant Logistics, Inc.

A sample envelope is shown below:

Sample Inhaler Envelope

County Residents will be able to request one Inhaler Envelope at a time via the Program website or toll-free number. County Residents will receive the Inhaler Envelopes no later than 10 business days from date of request.



Sample Auto Injector Container

County Residents will also be able request one auto-injector Mail-Back Container at a time via the Program website or toll-free number. County Residents will receive the Inhaler Envelopes no later than 10 business days from date of request. Auto-Injector Containers will meet all DOT requirements and will be fulfilled by 123 Compliance Logistics, LLC. See below for specifications and sample.

Access	Petals
Dimensions (in.)	7.5 x 3.6 x 3.6 in.
Color	Red
Lid Type	Hinge Cap
Liquid Absorbing Pad	Product has liquid absorbing pad
Universal Biohaz Sym	Product has universal biohaz symbol
Volume (L)	1.4 qt



Mail-Back Instructions

Mail-Back instructions to County Residents for all types of Mailers are provided in Appendix B.

Mail-Back Tracking

All Mailers (Unwanted Covered Drugs Envelopes, Inhaler Envelopes and Auto-Injector Containers) will have a unique, serialized identification number. Once the Mailer arrives at the destruction facility, the serial number, among other information, will be noted before final disposition. Please see the Disposal Section VI for additional information as to what information is retained for reporting purposes.

Mailers distributed directly to Residents via the website or via toll-free phone number requests will be tracked by Inmar when sent to Residents and tracked at the destruction facility when they are returned.

This tracking process will allow Inmar to report the number of Mailers distributed and returned in the Annual Reporting provided to the Department, as required.

Participating Collection Points and Mail-Back Distribution Sites

Appendix A provides lists of where Inmar has established Collection Points and Mail-Back Distribution Sites. These lists include:

- Appendix A-1 Confirmed Authorized Collectors
- Appendix A-2 Potential Authorized Collectors
- Appendix A-3 Confirmed Mail-Back Distribution Sites
- Appendix A-4 Target Mail-Back Distribution Sites

D. Collection Events

Inmar will provide Kiosks at regional locations convenient to the public and will conduct and promote Drug Take-Back Days in conjunction with a local Law Enforcement Agency. Our intention is to meet convenience standards by supplementing Collection Kiosks with Mail-Back locations in each supervisorial district. Semi-annually, the gaps in coverage and convenience that exist in each district will be evaluated, as well as progress being made against set collection goals to determine the need for Collection Events.

As a result of any identified gaps, we will plan and execute a Collection Event to provide additional support for the underserved population.

For the convenience of the public, Inmar will work with the Department, local Law Enforcement Agencies and local communities to determine the appropriate number of Take-Back Day Events and their regional locations. So long as State and local health orders allow, Events will include the monthly one-day Events coordinated with the Household Hazardous Waste Department.

Location Planning

Locations of Collection Events will be determined based on the population centers that are most in need while taking into consideration their access to Collection Kiosks and Mail-Back Distribution Sites. Once the area of need is identified by the means described in Section V(a) above, Inmar will explore locations where it is feasible to host a Collection Event. Most often this will be at a Law Enforcement Agency or a satellite LEA location nearest the target area. However, Inmar has relationships with many other organizations that may be interested in hosting a Collection Event. We may determine these locations to be even more convenient for Residents if they are places that the population is already visiting on a regular basis or can accommodate unique situations such as drive-through collection during peak flu and virus seasons.

Additionally, Inmar will consider the willingness or availability for LEAs to provide oversight at the selected location. Inmar will ensure any selected locations meet all applicable laws and regulations.

Event Staffing and Oversight

In compliance with DEA 1317 (a)-(b), Inmar will ensure that at least one Law Enforcement Agency personnel is present at each Collection Event. LEAs will be responsible for maintaining any records of removal, storage, or destruction of the Controlled substances collected in a manner that is consistent with that Department's recordkeeping requirements for illicit Controlled substances evidence. In addition, any Controlled substances collected at Collection Events will be stored and transferred for destruction in a manner that prevents the diversion of these substances.

Inmar will also provide at least two staff members to be present to assist LEAs with logistics, coordination and/or other needs during the event. It will be Inmar's responsibility to coordinate with the County and LEAs to ensure compliance with all applicable laws and regulations. The Inmar team will work with the designated LEA to ensure that all material collected is placed in compliant Collection Kiosks and any material that does not meet legal requirements is rejected.

Execution Procedures

As required by DEA 1317.65, law enforcement officers employed and authorized by the LEA will maintain control and custody of the collected substances from the time the substances are collected from the ultimate user or person authorized to dispose of the ultimate user decedent's property until secure transfer, storage, or destruction of the Controlled substances has occurred.

Inmar recognizes and will ensure that only ultimate users and persons entitled to dispose of an ultimate user decedent's property in lawful possession of a Controlled substance in Schedule II-V may transfer these substances to law enforcement during the Collection Event. No other person will handle the Controlled substances at any time.

At the conclusion of Collection Events, Inmar will work with LEAs to ensure that the collected materials are properly weighed, packaged and shipped to Inmar's designated destruction partner (see Section VI) in compliance with all applicable laws. As is standard practice for Kiosk returns under this Plan, Inner Liners will be tracked via their unique identifiers from shipment location to the designated destruction facility.

Inmar will make certain that LEAs keep a record of the following information after the transfer of Controlled substances as a result of any Collection Events:

- Unique identification number of the sealed Inner Liner transferred
- Size of the sealed Inner Liner transferred (e.g., 35-gallon)
- Name, address, and registration number of the reverse distributor to whom the Controlled substances were transferred.

Collection Event Promotion

Inmar will work with the local Law Enforcement Agency or other designated location on any advertisement, promotion, set-up and tear down of the event and community engagement in person. Inmar will provide all promotion for the Collection Event, including local advertising, LEA (or other location organization), social media, and press releases to local news outlets.

Collection Event Fees and Costs

Inmar will pay all administrative and operational costs associated with Collection Events as part of this Plan.

VI. Transportation and Disposal Information

Pursuant to Ordinance 6.53.060 (A) Inmar complies with all local, State, and Federal laws and regulations applicable to disposal of medical waste and Controlled substances.

In accordance with Ordinance 6.53.060 (B), Inmar subcontracts with a trusted, permitted partner for hazardous waste disposal.

Kiosk Containers will be sent using Inmar's DOT Special Permit #20499, from the Authorized Collector via FedEx to Inmar's third party contractor, to 123 Compliant Logistics, LLC, a licensed DEA Reverse Distributor-Collector. All Mailers will be sent via USPS to 123 Compliant Logistics. 123 Compliant Logistics will record the following information upon receipt of every individual Container and Mailer:

- Date received
- Serialized barcode label information
- FedEx Tracking information (Kiosk Containers only)
- Weight
- Date transported to disposal facility
- Disposal date
- Manifest number (if applicable)

All information recorded will be transferred back to Inmar on a daily basis as part of the electronic raw data file via SSH File Transfer Protocol (SFTP). Any discrepancies observed at 123 Compliant Logistics will be recorded on discrepancy reports to prompt any corrective action.

123 Compliant Logistics operates in full compliance with DEA § 1317.75(c) which prohibits handling substances after they have been deposited into a Collection Kiosk.

All product shipped directly to 123 Compliant Logistics will be transported using their contracted, licensed hazardous waste transporter, TransChem Environmental to the appropriate disposal facility to be incinerated quickly, securely, efficiently and in accordance with all DEA requirements. 123 Compliant Logistics will be responsible for all DEA Form 41 record keeping requirements. Please refer to the table on the next page for the contracted disposal locations.

In reference to Ordinance 6.53.060 (B), 123 Compliant Logistics, TransChem Environmental and FedEx will comply with all local, State and Federal laws and regulations surrounding the transportation and disposal of Unwanted Covered Drugs.

Information on FedEx's 5-year record of penalties, violations and/or regulatory orders received is detailed in its SEC filings found on <http://investors.fedex.com/financial-information/sec-filings/default.aspx>. All other relevant permits and compliance history can be found in Appendix D.

123 Compliant Logistics, LLC 2626 N 29th Ave Phoenix, AZ 85009	Rory Buske 602-612-4140	DEA Reverse Distributor-Collector: R90571264	DEA Reverse Distributor-Kiosk Liners
123 Compliant Logistics, LLC 1888 M Street, Suite B Agawam, MA 01001	Chris Ellis 480-695-2015	DEA Reverse Distributor-Collector: R90595946	DEA Reverse Distributor-Mail-Back Packages
Clean Harbors Aragonite 11600N. Aptus Rd. Aragonite, UT94029	Michael Marlow 435-884-8100	EPA ID: UTD981552177	Hazardous Waste Incinerator - All Unwanted Covered Drugs
Clean Harbors El Dorado, LLC 309 American Circle El Dorado, AR 71730	Dan Roblee 870-863-7173	EPA ID: ARD069748192	Hazardous Waste Incinerator - All Unwanted Covered Drugs
Veolia ES Technical Solutions, L.L.C 7665 Highway 73 Port Arthur, TX 77640	David Michaelis 281-216-9618	EPA ID: TXD000838896	Hazardous Waste Incinerator - All Unwanted Covered Drugs
TransChem Environmental 542 East 27th Street Tuscon, AZ 85713	520-829-5651	DOT Registration: 052119550060B Hazardous Materials Safety Permit: US-1341480-AZ-HMSP	Hazardous Waste Transporter - All Unwanted Covered Drugs
FedEx	Eric Stillson 800-469-9993		Common Carrier – Kiosk Containers
USPS	Jackie Purcell 919-501-9394		Common Carrier – All Mail-Back Packages

VII. Policies and Procedures

Inmar will ensure that it acts in compliance with all applicable laws, rules, and regulations as specified by the Program requirements and require by contract where applicable that vendors and Collection Points are also compliant with all laws, regulations, and legal requirements.

Inmar, Collection Points, and vendors will specifically be required to comply with The Controlled Substances Act, 21 USC SS 801-971 and 21 CFR SS 1317; United States Department of Transportation Hazardous Materials Regulation, 49 CFR parts 100-185; California Board of Pharmacy, title 16, Article 9.1 and all applicable Alameda County Ordinances and Regulations.

The DEA Rule defines Authorized Collectors as Law Enforcement Agencies and additionally as retail pharmacies, reverse distributors, hospitals, or clinics with onsite pharmacies, and certain other entities that are registered with DEA as an Authorized Collector.

Inmar has established standard operating procedures that require Authorized Collectors to adhere to these standards. Any Authorized Collector agreements specifically require their compliance ensuring their commitment to compliant operation of the Collection Points and shipping of contents in compliance with the DEA regulations. A refusal to sign the agreement or comply with the DEA regulations would be a reason why an Authorized Collector would be excluded from the Inmar Stewardship Plan.

Documentation and Tracking

Pursuant to the Ordinance 6.54.050 (A) (7) and the Regulation § 8 (A) (iii – iv), the below section outlines the Plan's management practices, policies, and procedures. Collection Containers and Inner Liners will have a serialized identification number to enable tracking at all stages of the return process illustrated below.



Shipment
from Inmar



Receipt at
Collection Site



Storage and Use at
Collection Site



Sealing and
Shipment from
Collection Site



Arrival and
Destruction at
Destruction Facility

Tracking is well-documented as evidenced by the Inmar serialization tracking form that is included at the end of this section. This form must be completed and witnessed by two authorized Pharmacy Employees, which assures compliance and safety across the Program, and internally by both the Stewardship Organization and the Authorized Collector.

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #:					
Size of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #					
1 SERIAL NUMBER	2 Date Liner Acquired (1 Signature)	3 Date Liner Installed (2 Names & Signatures)		4 Date Removed (2 Names & Signatures)		5 Date Transferred to Storage (2 Names & Signatures)		6 Date Shipped (2 Names & Signatures)	
Ex: 32587	4/26/19	4/26/19		5/26/19		5/26/19		5/27/19	
	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>	John Jones <i>John Jones</i>
	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>	Sally Smith <i>Sally Smith</i>

The purpose of this form is to document the use of the serialized Inner Liner throughout the collection process and to help the Authorized Collector meet DEA and Board of Pharmacy record-keeping requirements. Inmar will require each Authorized Collector to understand and comply with all Federal, State, and local regulatory requirements pertaining to Unwanted Covered Drugs applicable at the authorized Collection Point.

The serial numbers, date acquired, and signature of one authorized Pharmacy Employee must be completed upon receipt of the Container and Inner Liner. As illustrated above, the date installed is to be completed by two authorized Pharmacy Employees with their names and signatures. The date the Container and Inner Liner are removed from the Kiosks is also to be noted with names and signatures. Finally, the date the Container and Inner Liner are shipped is noted with authorized names and signatures.

Authorized Collectors must maintain a copy of the completed form, a copy of the FedEx tracking information, and other records as applicable, on file at the Collection Point for at least two years.

Transport

The Authorized Collector will properly seal, store securely, and arrange for pickup of the sealed Inner Liner and its contents from the registered location in a manner consistent with DEA regulations. The Container will include a pre-addressed and prepaid shipping label. The FedEx representative will take possession of the Container and deliver the Container to an approved destruction facility for witnessed incineration.

Disposal

Once the Container/Inner Liner arrives at the destruction facility, the serial number will be noted before final disposition, which will allow Inmar to report the number of Containers/Inner Liners distributed and returned by each Collection Point in the Reporting provided to Alameda County, as required.

Compliance with Applicable Laws

Inmar operates across 44 states and the District of Columbia and maintains compliance with all applicable Federal, State, and local laws. Upon approval to act as a Plan Owner, Inmar, its vendors and Collection Points will comply with the Program requirements.

VIII. Outreach Program Design

A. Promotion

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness of the Plan and maximize participation pursuant to the Ordinances 6.53.050 (A) (8) and 6.53.070, and the Regulations §7 (G) and § 8 (A) (vi-vii). In addition to preventative education, Inmar's strategy is designed to ensure that where and how to return Unwanted Products is widely understood by Residents, pharmacists, retail pharmacies, health care facilities and providers, veterinarians, and veterinary hospitals.

Pursuant to the Ordinance 6.53.070, the individual components of Inmar's public outreach strategy are detailed below. Across all tactics, key messages will include, but not be limited to, the following:

- Promote safe storage of all drugs, wanted or unwanted, by Residents in their homes;
- Discourage stockpiling and storage of Unwanted Products in the home
- Describe where and how to return Unwanted Products
- Discourage improper disposal of drugs (e.g., flushing or solid waste collection)
- Identification of locations and Collection Events in the County as part of National Consumer Drug Take-Back Events
- Identification of Collection Events included in the County's Household Hazardous Waste Department as included on Stopwaste.org.

If more than one Stewardship Plan is approved by the Department, Inmar will seek to coordinate its promotional activities with other approved Programs. This coordination will begin upon plan approval with the goal of establishing a single system of promotion within 90 days of approval. However, the timeline of when this single system of promotion can be fully implemented will depend on the cooperation and availability of the other approved Plan Operators. Coordination efforts will include providing a single website and toll-free telephone number to access information about Collection services for all approved Stewardship Plans. Inmar will work with the existing Plan Operator to provide the Director with a mutually agreed upon document which outlines the principles of coordination and specifies the required elements of the single-system of promotion. Inmar will work with the current Plan Operator to coordinate on the following elements:

- 1) Jointly agree on website name with approval by the Department,
- 2) Jointly agree on toll-free telephone number,
- 3) Jointly agree to fund the website and toll-free number fairly,
- 4) Provide a joint document to the Department detailing the plan,
- 5) Meet immediately to discuss any confusion by ultimate users and take action to address, and
- 6) The approved Plan Operators will design and seek approval for a county-wide Program logo which will be readily recognizable for use on Kiosks, educational materials, the website and other ultimate user facing materials.

Although Inmar is willing to coordinate promotional activities with other approved Plan Operators, Inmar will execute its comprehensive and measurable public outreach strategy to drive awareness of the Plan and maximize participation pursuant to the Ordinances 6.53.050 (A) (8) and 6.53.070, and the Regulations §7 (G) and § 8 (A) (vi-vii) separately from other Plan Operators. The outreach strategy is outlined further below and in the Goals section.

Outreach Materials

Inmar will provide easily-consumable educational materials for dissemination to interested parties including Residents, pharmacists, retailers, and health care practitioners upon request and at no charge. Materials will be available in English, Spanish, Chinese, Vietnamese and Tagalog.

These materials will:

- Provide instruction on how to safely store covered drugs at home
- Inform of the risks of disposing of Unwanted Products in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)
- Outline how to participate in the Plan for safe disposal of Unwanted Products.

All materials will be easily understandable by interested parties with varying levels of English proficiencies as well as in the Required Languages and will leverage explanatory graphics to aid in comprehension.

Please see Appendix C for example materials.

B. Standardized Instructions

Collection Kiosk Signage

The Collection Kiosks themselves will be readily-recognizable. The standard color for the Kiosks is bright green for easy identification, and each Kiosk is adorned with clear graphical instructions for proper use, which will be provided in the English and Spanish and available in the other Required Languages upon request. Please see Appendix B for an image of the Collection Kiosk and disposal instructions.

C. Website and Toll-Free Number

Website

Inmar will provide a mobile-optimized website, appropriately translated into the Required Languages, which will publicize collection options and educate interested parties. Inmar will use enhanced search engine optimization to ensure easy location and access.

Specifically, the website will:

- Leverage Inmar's collaboration with Google Maps to allow interested parties to find the nearest Collection Point or Mail-Back Distribution Site via an interactive map. The list of locations will be updated monthly to ensure accuracy.
- Location list will be inclusive of all Kiosks located in the County including those operated by other Plan Owners.

- Allow interested parties to request prepaid Mail-Back Envelopes.
- Include educational and outreach materials promoting safe storage of covered drugs

Retailers or pharmacies interested in participating in the Plan will be able to request more information through the website.

Please see Appendix C for images of the website interface and functionality.

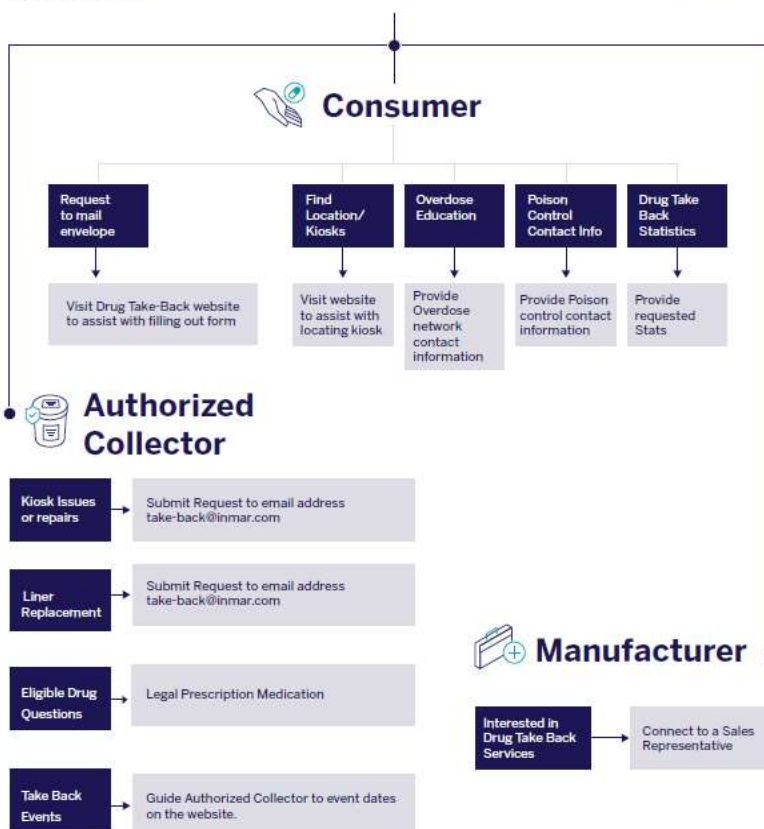
Toll-Free Number

Inmar will operate a multi-lingual, live operator (English, Spanish, Chinese, Vietnamese and Tagalog) toll-free call center that interested parties can call to learn more about the Plan, take-back events, and best practices for disposal of Unwanted Products. Callers will be validated by zip code for applicable County Plan offerings. County Residents will also be able to request information about the nearest Collection Point or Mail-Back Envelope Distribution Site, or request that a prepaid Mail-Back Envelope is sent to them. The call center is operated with live operators and will be staffed with a third party service to assist with live translation in the required languages. All operators are trained to assist an answer questions related to any and all questions related to the Stewardship Plan operation including but not limited to Authorized Collector Kiosk support and service requests.



CALL CENTER

Call Center Script: "Thank you for contacting the Consumer Drug Take Back Center. My name is _____. How May I Help you?"



D. Impact Measurement

Pursuant to the Ordinance 6.53.080 (A) (7), Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted media, Inmar's measurement tools and philosophies have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations.

Reporting will include:

- Third-party-verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

E. Traditional Media

Inmar has a system in place that allows us to efficiently deploy local media using traditional tactics for general awareness and programmatic media to sustain a presence throughout the years. Below are details broken out by medium that cover recommended placements.

- Direct Mail
 - Public service announcement (PSA) postcard sent to local residents (5x7 post card)
 - General Public
 - Option #1: Entire County
 - Option #2: Select Zip Codes
 - Option #3: Select Neighborhoods/Streets
 - Option #4: New Resident Mailers (mail to those that move INTO the area)
 - Pharmacies
 - List Purchase by zip code
 - Health Care Providers
 - List Purchase by zip code
 - Veterinary Providers
 - List Purchase by zip code
 - Public Health Facilities
 - List Purchase by zip code
- Print Ads
 - Run ads in local papers for 3-4 weeks to announce PSA
 - Selection of papers based on budget
- Television
 - Use viewership data and combine it with third-party data to find in market audiences and deliver an efficient and effective campaign across all viewing screens (Streaming, OTT, Mobile, Television, On-Demand)

- Whether by geography, content, audience, or addressability, target your audiences precisely.
- Track campaign performance with transparent metrics and get recommendations on how to optimize your next one.
- 22 Zones in the greater Bay Area
 - Berkeley CA
 - Contra Costa
 - Delta Valley
 - Fremont
 - Hayward
 - Lake CA
 - Livermore
 - Marin
 - Mid Peninsula
 - Napa
 - North Peninsula
 - Oakland
 - Redwood Empire
 - San Francisco
 - San Jose
 - Santa Rosa
 - Silicon Valley East
 - Silicon Valley West
 - South Peninsula
 - Tri Cities
 - Tri Valley
 - Vallejo
 - Channels local networks such as NBC, ABC, CBS, FOX and cable, streaming networks such as ESPN, Fox News, HGTV, Lifetime, Comedy Central, Bravo, CNN, CNBC, ESPN Deportes, Food Network, Fox Sports, FS1, Golf, History in Espanol and many more
- Radio
 - PSA
 - Top 8 stations in the greater Bay Area market highest ratings/reach

▪ KCBS-AM	All News	Entercom	8.4
▪ KQED-FM	News/Talk	KQED	7.5
▪ KNBR-AM	All Sports	Cumulus	4.8
▪ KLLC-FM	Hot AC	Entercom	4.7
▪ KISQ-FM	AC	iHeartMedia	4.3
▪ KOIT-FM	AC	Bonneville	4.1
▪ KIOI-FM	AC	iHeartMedia	3.2
▪ KSAN-FM	Classic Rock	Cumulus	3.2
- Programmatic Media
 - Leverage Inmar network of transparent retail audiences, to serve behaviorally targeted display and/or video ads
 - Geo-Targeting: Inmar will upload physical locations of drug receptacles and target individuals within close proximity to build awareness and encourage usage

F. Additional Promotional Considerations

Authorized Collector Marketing Support

To drive awareness and participation at a local level, Inmar will provide individual Authorized Collectors with a variety of marketing assets including in-store signage, social media content kits, press release templates, a radio ad script, and scripts for Pharmacy Employees to let County Residents know that they can safely dispose of their Unwanted Product at that location. Authorized Collectors will be able to request additional marketing materials through the toll-free number.

Please see Appendix C for example materials.

Social Influencer Marketing

Each Inmar Intelligence social influencer campaign progresses through four stages: Plan, Discover, Activate, and Measure.

Plan

In the Plan stage, we leverage our in-house social insights toolkit, to create content themes and targeting parameters. The Inmar team pulls data across 36MM social engagements to lend insight into trending topics, ideal campaign timing, and key audience demographics. For example, our social media toolkit may illustrate that conversations around National Consumer Drug Take-Back Day spike three weeks prior to the event in certain regions, among a specific demographic. With this knowledge in hand, Inmar Intelligence works with our influencers to curate and distribute content related to National Consumer Drug Take-Back Day and distribute it to the target audience who live in a specific area in the three weeks leading up to the Event.

Discover

The Discovery stage is where influencers are matched to the campaign. Inmar Intelligence has a private, invite-only community of influencers each individually vetted for content quality, historical performance and audience quality.

Activate

Once the influencers have been selected, it is time to start creating and distributing content. Influencers are provided with a brief that outlines the key message, desired outcomes, and any parameters or restrictions. Outside of the brief, influencers are given creative liberty to ensure that the content still feels authentic and will resonate with their followers. Importantly, partners have the ability to approve content to ensure it meets their requirements before it is published.

Upon distribution, influencers organically reach thousands of engaged followers and subscribers on their respective social platforms. Inmar Intelligence's Media Operations team closely monitors the performance of each individual post and compares it to benchmark data. Particular emphasis is put on metrics such as engagements, clicks, and shares (as opposed to views and impressions) because the former metrics suggest action and deep engagement rather than a passive (or even unconscious) glance at the content.

Measure

For the entirety of the campaign, an online dashboard enables us to continuously monitor campaign performance. All metrics reported within the dashboard are third-party verified. Inmar has a curated network of more than 12,000 highly-vetted influencers who are experts at creating authentic, compelling

content that can drive awareness and inspire participation among covered entities. Inmar utilizes sophisticated influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the covered entities receiving the content are the ones most inclined to take action.

Content can focus on an array of topical themes, however, based on the Program requirements Inmar's recommendation would be one, or a combination of, the following:

- Tips for safe storage of medications in the home prior to disposal
- Education about the implications of improper drug disposal
- Promotion of the Product Stewardship Plan, including directions on where and how to participate.

Cross Promotion with Stopwaste.org

Inmar can leverage any of the tactics described in this section to promote the stopwaste.org website and social media channels in a manner mutually agreed upon with the County, including, but not limited to:

- Referencing the stopwaste.org website and social media channels on educational and outreach materials, as well as in-store signage
- Referencing the stopwaste.org website and social media channels in social media and PR content kits provided to Authorized Collectors
- Running a social influencer marketing campaign to drive influencers' followers to the stopwaste.org website and social channels
- Delivering optimized paid media ad units driving a targeted cohort of covered entities to stopwaste.org.

In cross-promoting stopwaste.org with the LifeInCheck™ Consumer Drug Take-Back Program, Inmar can provide covered entities with a broader view of what it means to dispose of Unwanted Products in a safe and sustainable way.

Biennial Survey

To measure the effectiveness of the comprehensive and measureable public outreach strategy, Inmar will conduct a biennial survey of County Residents as well as pharmacists, veterinarians, and health professionals separately who interact with patients on use of medicines after the first full year of operation of the Stewardship Plan. The aim of the survey questions will be to measure the percent awareness of the Stewardship Plan, assess to what extent drop-off sites and other collection methods are convenient and easy to use, and assess knowledge and attitudes about risks of abuse, poisonings, and overdoses from prescription and non-prescription drugs used in the home.

IX. Annual Reporting

Pursuant to the Ordinance 6.53.080 and the Regulation §15 as the Department advises and annually thereafter, Inmar will submit a report describing the Plan's activities during the previous reporting period. The report will include:

- a. Report Narrative with the following subsections:
 - i. Executive summary to include a brief description of collection and disposal efforts during the reporting period

- ii. A Summary of the Plan goals to include degree of success and opportunities of unmet goals
- iii. Proposed Goals to be accomplished in the upcoming year
- iv. A description of the collection efforts of the past year
- v. A description of education and public outreach efforts of the past year
- vi. Safety and Security report including any known security and safety incidents at Collection Points along with any corrective or other action taken in response to the incident, law enforcement involved or any litigation arbitrations or other legal proceedings arising out of or involving the incident.
- b. Report Data containing the following:
 - i. All Producers participating in the Plan
 - ii. Each Collection Site location: host Site name and address, weight of collected Unwanted Products over the past year and number of times Unwanted Products were picked up for transportation
 - iii. Mail-Back Program to include number of Mail-Back Envelopes distributed, returned and total weight of collected Unwanted Products
 - iv. For each Disposal Facility: name address and telephone number, total weight of collected Unwanted Products disposed.

X. Patient Privacy

Inmar provides significant training to our participating Authorized Collectors and strictly follows the DEA guidelines for the proper handling of the Plan Kiosks and Inner Liners. This begins with the proper training of the Authorized Collector in the compliant operation of the Kiosks and proper preparation, removal, and packaging of the Container. It also involves the training of the Inmar staff that may come into contact with the full Container to ensure proper handling. Inmar strictly complies with State and Federal statutes and regulations including, but not limited to, the DEA guidelines cited below.

According to the DEA - As provided in §§ 1317.60(c) and 1317.70(f), Inner Liners shall be sealed immediately upon removal from the permanent outer Container; sealed Inner Liners and returned Mail-Back Containers shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into Kiosks or Mail-Back Containers. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into Collection Kiosks.

Inmar has a long history of serving both commercial and government clients with stringent Program requirements. For example, Inmar's pharmacy applications manage Protected Healthcare Information (PHI) and are HIPAA compliant. Additionally, as part of Inmar's Rx Returns (reverse distribution) business, we work very closely with regulators to implement compliant procedures covering the DEA, Boards of Pharmacy, EPA, and other tangential regulatory entities. Data protection, privacy, and adherence to applicable regulations are the foundation of Inmar service capabilities. Any and all patient information on drug packaging will be promptly destroyed.

XI. Goals

Program Collection Goals

90 Days	12 Months
<ul style="list-style-type: none"> Initiate Plan operation Increase Authorized Collection Points in the County 	<ul style="list-style-type: none"> Inmar's goal is to achieve 100 Kiosks distributed jointly, in combination with other Plan Owners, across the County to provide equitable and reasonably convenient access to Residents. Establish Mail-Back Programs and/or Take-Back Events in areas that are underserved by Collection Points. Provide and communicate system for pharmacies to request Mail-Back Envelopes.

Program Promotion Goals

3 Months	6 Months	12 Months	18 Months
<ul style="list-style-type: none"> Website launch Covered entity educational materials Authorized Collector marketing support materials Direct mail communication & print add marketing commences 	<ul style="list-style-type: none"> Website functionality updates <ul style="list-style-type: none"> Return Envelope requests Educational materials uploaded Authorized Collector Kiosk maintenance resources and requests Collection Point and Mail-Back Envelope Distribution Site list updated (ongoing) Initiate social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) Television & radio campaigns initiated 	<ul style="list-style-type: none"> Website functionality updates <ul style="list-style-type: none"> Translation into specified languages Collection Point and Mail-Back Envelope Distribution Site list updated (ongoing) Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) Continue television & Radio campaigns 	<ul style="list-style-type: none"> Website functionality updates <ul style="list-style-type: none"> Collection Point and Mail-Back Envelope Distribution Site list updated (ongoing) Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) Direct mail and print add marketing continues Continue television & radio campaigns

XII. Additional Plan Considerations

Existing Plan Owners

If more than one Stewardship Plan is approved by the Department, Inmar will seek to coordinate its promotional activities with other approved Programs. This coordination will begin upon Plan approval with the goal of establishing a single system of promotion within 90 days of approval. However, the timeline of when this single system of promotion can be fully implemented will depend on the cooperation and availability of the other approved Plan Operators. Coordination efforts will include providing a single website and toll-free telephone number to access information about Collection services for all approved Stewardship Plans. Inmar will work with the existing Plan Operator to provide the Director with a mutually agreed upon document which outlines the principles of coordination and specifies the required elements of the single-system of promotion. Inmar will work with the current Plan Operator to coordinate on the following elements:

1. Jointly agree on website name with approval by the Department,
2. Jointly agree on toll-free telephone number,
3. Jointly agree to fund the website and toll-free number fairly,
4. Provide a joint document to the Department detailing the plan,
5. Meet immediately to discuss any confusion by ultimate users and take action to address, and
6. The approved Plan Operators will design and seek approval for a state-wide Program logo which will be readily recognizable for use on Kiosks, educational materials, the website and other ultimate user facing materials.

Although Inmar is willing to coordinate promotional activities with other approved Plan Operators, Inmar will execute its comprehensive and measurable public outreach strategy to drive awareness of the Plan and maximize participation pursuant to the Ordinances 6.53.050 (A) (8) and 6.53.070, and the Regulations §7 (G) and § 8 (A) (vi-vii) separately from other Plan Operators. The outreach strategy is outlined further above and in the Goals section.

Package Separation & Recycling

DEA §1317.75(c) prohibits handling substances after they have been deposited into a Collection Kiosk. For this reason, Inmar is unable to separate and recycle drug packaging. However, Inmar can execute educational Programs, as outlined in Section VI, to encourage County Residents to separate Unwanted Products from their packaging and recycle the packaging prior to disposal.

Even though regulations prevent us from recycling drug packaging, Inmar still has a vested interest in reducing waste and improving our environment. We will continue to look for opportunities to expand our eco-friendly efforts in the County.

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Appendix A-1: Confirmed Authorized Collectors

Site Name	Site Address	Site City	Zip	District
SAFEWAY PHARMACY #2708	2227 SOUTH SHORE CENTER	Alameda	94501	3
SAFEWAY PHARMACY #3281	2600 5TH ST.	Alameda	94501	3
SAFEWAY PHARMACY #0951	867 ISLAND DRIVE BRIAN / PHARMACY	Alameda	94502	3
SAFEWAY PHARMACY #0691	1444 SHATTUCK PLACE	Berkeley	94709	5
Univ of Cal Univ Health Services (CS)	Tang Center, 2222 Bancroft Way Room 1115	Berkeley	94720	5
SAFEWAY PHARMACY #1953	7499 DUBLIN BLVD	Dublin	94568	1
Lucky Store #712	34101 FREMONT BLVD	Fremont	94555	2
SAFEWAY PHARMACY #0993	3902 WASHINGTON BLVD	Fremont	94538	1
Lucky Store #711	40055 MISSION BLVD	Fremont	94539	1
SAFEWAY PHARMACY #1931	46848 MISSION BLVD	Fremont	94539	1
Lucky Store #714	5000 MOWRY AVE	Fremont	94538	1
SAFEWAY PHARMACY #0971	22280 FOOTHILL BOULEVARD	Hayward	94541	2
Lucky Store #715	22555 MISSION BLVD	Hayward	94541	2
Lucky Store #716	25151 SANTA CLARA ST	Hayward	94544	2
Lucky Store #722	1951 HOLMES ST	Livermore	94550	1
Lucky Store #721	2000 PORTOLA AVE	Livermore	94550	1
SAFEWAY PHARMACY #1257	4495 FIRST ST	Livermore	94551	1
TIB Pharmacy	7999 Gateway Blvd., Suite 110	Newark	94560	2
Lucky Store #736	247 E 18TH ST	Oakland	94606	3
SAFEWAY PHARMACY #3132	5100 BROADWAY	Oakland	94611	5
SAFEWAY PHARMACY #2870	6310 COLLEGE AVE	Oakland	94618	5
Lucky Store #744	6155 W LAS POSITAS	Pleasanton	94566	4
SAFEWAY PHARMACY #2856	6790 BERNAL AVE	Pleasanton	94566	4
Lucky Store #767	1300 FAIRMONT DR	San Leandro	94578	3

Lucky Store #768	15840 HESPERIAN BLVD	San Lorenzo	94580	3
SAFEWAY PHARMACY #1197	1790 DECOTO ROAD	Union City	94587	2
Lucky Store #782	32300 DYER ST	Union City	94587	2

Appendix A-2: Potential Authorized Collectors

Site	Site Address	Site City	Zip	District	Status
WAL-MART PHARMACY 10-5426	40580 ALBRAE STREET	FREMONT	94538	1	In Discussion
WAL-MART PHARMACY 10-2989	44009 OSGOOD ROAD	FREMONT	94539	1	In Discussion
WAL-MART PHARMACY 10-1972	2700 LAS POSITAS RD	LIVERMORE	94551	1	In Discussion
KAISER FOUNDATION HOSP	300-G PULLMAN STREET	LIVERMORE	94550	1	In Discussion
WAL-MART PHARMACY 10-2031	30600 DYER STREET	UNION CITY	94587	2	In Discussion
KAISER FOUND HLTH PLAN, INC	3555 WHIPPLE ROAD	UNION CITY	94587	2	In Discussion
WAL-MART PHARMACY #5434	15555 HESPERIAN BLVD.	SAN LEANDRO	94579	3	In Discussion
WAL-MART PHARMACY 10-5611	3112 SANTA RITA RD.	PLEASANTON	94566	4	In Discussion
WAL-MART PHARMACY 10-2161	4501 ROSEWOOD DR	PLEASANTON	94588	4	In Discussion
KAISER FOUNDATION HEALTH PLAN	5600 STONERIDGE MALL ROAD	PLEASANTON	94588	4	In Discussion
CHILDREN'S CLINIC PHARMACY	747 52ND STREET	OAKLAND	94609	5	In Discussion
EAST BAY AIDS CENTER OUTPATIENT PHARMACY	3100 SUMMIT ST, 2447A	OAKLAND	94609	5	In Discussion
KAISER PERMANENTE PHARMACY #181	1795 SECOND ST SUITE B	BERKELEY	94710	5	In Discussion
Alta Bates Summit Medical Center-Herrick Campus	2001 Dwight Way	Berkeley	94704	5	In Discussion
CVS PHARMACY # 17628	2800 DUBLIN BLVD	DUBLIN	94568	1	Notified
MAXOR NATIONAL PHARMACY SERVICES LLC	5325 BRODER BLVD	DUBLIN	94568	1	Notified
DBA COSTCO PHARMACY #778	43621 PACIFIC COMMONS BLVD	FREMONT	94538	1	Notified
CVS PHARMACY # 17592	43950 PACIFIC COMMONS BLVD	FREMONT	94538	1	Notified
DBA: WALGREENS # 02660	41400 BLACOW RD	FREMONT	94538	1	Notified
DBA: WALGREENS # 04517	2600 MOWRY AVE	FREMONT	94538	1	Notified
LIRX	1860 MOWRY AVE, STE 102	FREMONT	94538	1	Notified
DBA: WALGREENS # 02366	3860 DECOTO ROAD	FREMONT	94555	1	Notified
DBA COSTCO PHARMACY #146	2800 INDEPENDENCE DR	LIVERMORE	94550	1	Notified
DBA: WALGREENS #15163	1620 FIRST ST.	LIVERMORE	94550	1	Notified
CVS PHARMACY # 16275	4300 LAS POSITAS RD	LIVERMORE	94551	1	Notified
DBA: WALGREENS # 02401	21463 FOOTHILL BLVD.	HAYWARD	94541	2	Notified
DBA: WALGREENS # 06502	23958 HESPERIAN BLVD	HAYWARD	94541	2	Notified
DBA COSTCO PHARMACY #1061	28505 HESPERIAN BLVD	HAYWARD	94545	2	Notified
CVS PHARMACY # 17265	19661 HESPERIAN BLVD	HAYWARD	94541	2	Notified
PLEASANT CARE PHARMACY	1652 B STREET	HAYWARD	94541	2	Notified
CVS PHARMACY # 16804	2499 WHIPPLE RD	HAYWARD	94544	2	Notified

DBA: WALGREENS # 02306	1138 W TENNYSON RD	HAYWARD	94544	2	Notified
DBA: WALGREENS # 04659	164 W. JACKSON ST.	HAYWARD	94544	2	Notified
CORAM HEALTHCARE CORP OF NORTHERN CALIFO	3160 CORPORATE PL	HAYWARD	94545	2	Notified
EVERGREEN PHARMACEUTICAL OF CALIFORNIA, dba OMNICARE OF HAYWARD	20967 CABOT BLVD	HAYWARD	94545	2	Notified
KPNC-HAYWARD CLINIC OP-Clinic	27303 SLEEPY HOLLOW	HAYWARD	94545	2	Notified
SKILLED NURSING PHARMACY	21150 CABOT BOULEVARD	HAYWARD	94545	2	Notified
TIB PHARMACY LLC	5886 MOWRY SCHOOL ROAD	NEWARK	94560	2	Notified
ENTIRELYPETS PHARMACY LLC	34571 SEVENTH STREET	UNION CITY	94587	2	Notified
MASONIC HOME PHARMACY	34400 MISSION BLVD	UNION CITY	94587	2	Notified
RITE AID #5943	1650 DECOTO ROAD	UNION CITY	94587	2	Notified
DBA: WALGREENS # 04050	1916 WEBSTER ST.	ALAMEDA	94501	3	Notified
DBA: WALGREENS #15666	1600 PARK ST	ALAMEDA	94501	3	Notified
SUTTER INFUSION & PHARMACY SERVICES #2	1105 ATLANTIC AVENUE	ALAMEDA	94501	3	Notified
VERSAILLES PHARMACY	2801 ENCINAL AVE	ALAMEDA	94501	3	Notified
LA CLINICA DE LA RAZA	3451 EAST 12TH STREET	OAKLAND	94601	3	Notified
NEW CHINATOWN PHARMACY	719 E 12TH ST	OAKLAND	94606	3	Notified
DBA: WALGREENS #10526	3250 LAKESHORE AVE STE B	OAKLAND	94610	3	Notified
DBA COSTCO PHARMACY #118	1900 DAVIS ST	SAN LEANDRO	94577	3	Notified
KPNC-SAN LEANDRON OP #921-Clinic	2500 Merced St Flr#1	SAN LEANDRO	94577	3	Notified
ONEPOINT PATIENT CARE, LLC	1599 FACTOR AVE.	SAN LEANDRO	94577	3	Notified
DBA: WALGREENS # 07274	1456 136TH AVE	SAN LEANDRO	94578	3	Notified
DOLPHIN HEALTH PHARMACY	7400 MACARTHUR BLVD	OAKLAND	94605	4	Notified
DBA: CVS/PHARMACY # 09929	2000 MOUNTAIN BLVD	OAKLAND	94611	4	Notified
DBA: WALGREENS # 03295	8102 INTERNATIONAL BLVD	OAKLAND	94621	4	Notified
DBA: WALGREENS # 02150	1763 SANTA RITA RD	PLEASANTON	94566	4	Notified
RALEY'S PHARMACY #316	5420 SUNOL BLVD.	PLEASANTON	94566	4	Notified
CLEAR CHOICE PHARMACY	3059 HOPYARD RD.	PLEASANTON	94588	4	Notified
DBA: CVS/PHARMACY # 09595	1382 SOLANO AVE	ALBANY	94706	5	Notified
CVS PHARMACY # 17044	1057 EASTSHORE HWY	ALBANY	94710	5	Notified
CVS PHARMACY # 17673	2187 SHATTUCK AVE	BERKELEY	94704	5	Notified
DBA: WALGREENS #10045	2310 TELEGRAPH AVE	BERKELEY	94704	5	Notified
PRIME HEALTH PHARMACY	2915 TELEGRAPH AVE, STE 100	BERKELEY	94705	5	Notified

PHARMACA INTEGRATIVE PHARMACY	1744 SOLANO AVENUE	BERKELEY	94707	5	Notified
DBA: WALGREENS # 02314	1050 GILMAN ST	BERKELEY	94710	5	Notified
CVS PHARMACY # 17624	1555 40TH STREET	EMERYVILLE	94608	5	Notified
STANFORD EMERYVILLE HEALTH CENTER PHARMA	5800 HOLLIS STREET, ROOM 2325	EMERYVILLE	94608	5	Notified
DBA: WALGREENS # 01537	3232 FOOTHILL BLVD	OAKLAND	94601	5	Notified
WEST OAKLAND HEALTH CENTER	700 ADELINE STREET	OAKLAND	94607	5	Notified
AIDS HEALTHCARE FOUNDATION/AHF PHARMACY	400 THIRTIETH STREET	OAKLAND	94609	5	Notified
DBA: WALGREENS # 03170	3400 TELEGRAPH AVENUE	OAKLAND	94609	5	Notified
NICHOLS HILL PRESCRIPTION PHARMACY	2844 SUMMIT STREET	OAKLAND	94609	5	Notified
COMMUNITY, A WALGREENS PHARMACY #16477	3009 BROADWAY	OAKLAND	94611	5	Notified
OAKLAND CLINIC PHARMACY	5220 CLAREMONT AVE	OAKLAND	94618	5	Notified
PHARMACA INTEGRATIVE PHARMACY, INC.	5729 COLLEGE AVE.	OAKLAND	94618	5	Notified

Appendix A-3: Confirmed Mail-Back Sites

Site Name	Site Street Address	Site City	Zip	District	Status
Sutter Care at Home - Hospice	1025 Atlantic Avenue, Suite 350B	Alameda	94501	3	Confirmed Mail-Back Site
Lucky California-700	815 MARINA VILLAGE PKWY	ALAMEDA	94501	3	Confirmed Mail-Back Site
Safeway-676	1500 Solano Ave	Albany	94706	5	Confirmed Mail-Back Site
Alta Bates Outpatient Pharmacy	2001 Dwight Way	Berkeley	94704	5	Confirmed Mail-Back Site
Lifelong Medical Care	2031 6th Street	Berkeley	94710	5	Confirmed Mail-Back Site
Lifelong Medical Care	2031 Sixth Street	Berkeley	94710	5	Confirmed Mail-Back Site
Safeway-768	20629 Redwood Rd	Castro Valley	94546	4	Confirmed Mail-Back Site
Lucky-704	3443 CASTRO VALLEY BLVD	CASTRO VALLEY	94546	4	Confirmed Mail-Back Site
Lucky California-750	2840 DUBLIN BLVD	DUBLIN	94568	1	Confirmed Mail-Back Site
Safeway-1932	4440 Tassajara Rd	Dublin	94568	1	Confirmed Mail-Back Site
Safeway-1953	7499 Dublin Blvd	Dublin	94568	1	Confirmed Mail-Back Site
Pak 'N Save-3125	3889 San Pablo Ave	Emeryville	94608	5	Confirmed Mail-Back Site
Lucky-712	34101 FREMONT BLVD	FREMONT	94555	2	Confirmed Mail-Back Site
Lucky California-713	35820 FREMONT BLVD	FREMONT	94536	2	Confirmed Mail-Back Site
Lifescrypt Pharmacy	39039 Paseo Padre Parkway Suite 201	Fremont	94538	1	Confirmed Mail-Back Site
FoodMaxx -409	39441 FREMONT BLVD	FREMONT	94538	1	Confirmed Mail-Back Site
Lucky-711	40055 MISSION BLVD	FREMONT	94539	1	Confirmed Mail-Back Site
HALLERS LTC PHARMACY	4067 PERALTA BOULEVARD	Fremont	94536	1	Confirmed Mail-Back Site

Haller's LTC Pharmacy	4067 Peralta Boulevard	Fremont	94536	1	Confirmed Mail-Back Site
Lucky-714	5000 MOWRY AVE	FREMONT	94538	1	Confirmed Mail-Back Site
Lucky-715	22555 MISSION BLVD	HAYWARD	94541	2	Confirmed Mail-Back Site
Lucky California-716	25151 SANTA CLARA ST	HAYWARD	94544	2	Confirmed Mail-Back Site
FoodMaxx -406	27300 HESPERIAN BLVD	HAYWARD	94545	2	Confirmed Mail-Back Site
Lucky California-722	1951 HOLMES ST	LIVERMORE	94550	1	Confirmed Mail-Back Site
Lucky-721	2000 PORTOLA AVE	LIVERMORE	94550	1	Confirmed Mail-Back Site
FoodMaxx -462	39966 CEDAR BLVD	NEWARK	94560	2	Confirmed Mail-Back Site
FoodMaxx -417	10950 INTERNATIONAL BLVD	OAKLAND	94603	4	Confirmed Mail-Back Site
Lucky California-734	1963 MOUNTAIN BLVD	OAKLAND	94611	4	Confirmed Mail-Back Site
Lucky-736	247 E 18TH ST	OAKLAND	94606	3	Confirmed Mail-Back Site
FoodMaxx -484	3000 EAST 9TH STR	OAKLAND	94606	3	Confirmed Mail-Back Site
Specialty Mental Health - Oakland	310 8th Street, Suite 210	Oakland	94607	3	Confirmed Mail-Back Site
Mindful Health Solutions - Oakland	3300 Webster Street, Suite 402	Oakland	94609	5	Confirmed Mail-Back Site
Crossroads Home Health - Oakland	333 Hegnberger Road, Suite 710	Oakland	94621	4	Confirmed Mail-Back Site
Crossroads Hospice - Oakland	333 Hegnberger Road, Suite 710	Oakland	94621	4	Confirmed Mail-Back Site
Safeway-908	3550 Fruitvale Ave	Oakland	94602	4	Confirmed Mail-Back Site
Aids Healthcare Foundation - Oakland	400 30th Street, Suite 300	Oakland	94609	5	Confirmed Mail-Back Site
Home Care Assistance - Oakland	5275 Broadway	Oakland	94618	5	Confirmed Mail-Back Site
Alegre Home Care - East Bay	5767 Broadway, Suite 201	Oakland	94618	5	Confirmed Mail-Back Site

Bonita House Inc.	6333 Telegraph Avenue, Suite 102	Oakland	94609	5	Confirmed Mail-Back Site
New Chinatown Pharmacy	719 East 12th Street	Oakland	94606	3	Confirmed Mail-Back Site
California Sinus Center	5924 Soneridge Drive Suite 207	Pleasanton	94588	4	Confirmed Mail-Back Site
Lucky-744	6155 W LAS POSITAS	PLEASANTON	94566	4	Confirmed Mail-Back Site
Lucky California-767	1300 FAIRMONT DR	SAN LEANDRO	94578	3	Confirmed Mail-Back Site
MEDICAL ARTS PHARMACY	13847 EAST 14TH STREET SUITE 103	San Leandro	94578	3	Confirmed Mail-Back Site
Specialty Mental Health - San Leandro	433 Callan Avenue, Suite 301	San Leandro	94577	3	Confirmed Mail-Back Site
FoodMaxx -416	699 LEWELLING BLVD	SAN LEANDRO	94579	3	Confirmed Mail-Back Site
Lucky California-768	15840 HESPERIAN BLVD	SAN LORENZO	94580	3	Confirmed Mail-Back Site
FoodMaxx -463	30073 INDUSTRIAL PARKWAY SW	UNION CITY	94587	2	Confirmed Mail-Back Site
Lucky-782	32300 DYER ST	UNION CITY	94587	2	Confirmed Mail-Back Site

Appendix A-4: Target Mail-Back Sites

Site	Site Address	Site City	Zip	Status
Asian Health Services	555 Ralph Appezzato Memorial Pkwy	Alameda	94501	Target Mail-Back
ASC Pharmacist Consultants, Inc.	248 3rd St	Albany	94706	Target Mail-Back
Lifelong Medical Care	3260 Sacramento Ave	Berkeley	94703	Target Mail-Back
Stat Med PC	1667 Amador Valley Blvd	Dublin	94568	Target Mail-Back
IDEXX Labs - Fremont	46700 Lakeview Blvd	Fremont	94538	Target Mail-Back
Eurofins	42501 Albrae St	Fremont	94538	Target Mail-Back
Eurofins DiscoverX Fremont	42501 Albrae St	Fremont	94538	Target Mail-Back
Bay Area Community Health	2300 Mowry Ave	Fremont	94538	Target Mail-Back
Bay Area Community Health	40924 Fremont St	Fremont	94538	Target Mail-Back
Washington Township Medical Group, Inc	Student & Business Ser	Fremont	94538	Target Mail-Back
Grand Lake Gardens	401 Santa Clara Ave	Oakland	94610	Target Mail-Back
Piedmont Gardens	110 41st St	Oakland	94611	Target Mail-Back
Asian Health Services	190 11th V Street	Oakland	94607	Target Mail-Back
Asian Health Services	310 8th St	Oakland	94607	Target Mail-Back
Asian Health Services	345 9th St	Oakland	94607	Target Mail-Back
Asian Health Services	416 8th St	Oakland	94607	Target Mail-Back
Asian Health Services	835 Webster St	Oakland	94607	Target Mail-Back
Planned Parenthood Mar Monte	1682 7th Street	Oakland	94607	Target Mail-Back
Piedmont Primary Care	1345 Grand Ave	Oakland	94610	Target Mail-Back
Aids Healthcare Foundation	238 E 18th St	Oakland	94606	Target Mail-Back
Aids Healthcare Foundation	400 30th St.	Oakland	94609	Target Mail-Back
Aids Healthcare Foundation	389 30th St	Oakland	94609	Target Mail-Back
Veterinary Specialty Center of Seattle	1961 Mountain Blvd	Oakland	94611	Target Mail-Back
TestAmerica Pleasanton	1220 Quarry Ln	Pleasanton	94566	Target Mail-Back
Neighborhood Health Center	4361 Railroad Ave	Pleasanton	94566	Target Mail-Back
ESS Corporate Headquarters	604 143rd Ave	San Leandro	94578	Target Mail-Back
Asian Health Services	101 Callan Ave	San Leandro	94577	Target Mail-Back
Jane Wardzinska, MD	13487 E 14th St	San Leandro	94578	Target Mail-Back
Tiburcio Vasquez Health Center	39270 Alvarado Niles Rd	Union City	94587	Target Mail-Back

Appendix B: Kiosk Signage & Mailer Instructions

Note: all promotional material will be updated upon coordination with other approved Plan Operators and these images are merely examples of the content that will be included.



ACCEPTED

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



NOT ACCEPTED

HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT-DRUGS.

Name: 123 Pharmacy
Contact: (555) 555-5555



MEDICINE DISPOSAL

Eliminación de medicamentos

药物处置

Cách thải bỏ thuốc

Pagtatapon ng gamot

ALCA

SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES



01

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



02

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

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



03

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.

For more information about the drug disposal program,
please go to safemedicinedrop.com or call 1-888-371-0717.

Sample Mail-back Insert for Covered Drugs

MAIL-BACK PACKAGE IS FOR

**UNWANTED
OR EXPIRED
MEDICATIONS**



ACCEPTED

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

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

NOT ACCEPTED

Herbal remedies, vitamins, supplements, cosmetics, other personal care products, inhalers, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

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

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

Sample Inhaler Mail-back Insert



MAIL-BACK PACKAGE IS FOR **INHALERS**



ACCEPTED

Inhalers

NOT ACCEPTED

Unwanted medicines that are not inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

Note: 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.

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

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

Sample Auto-injector Mail-back Insert



MAIL-BACK PACKAGE IS FOR **PRE-LOADED PRODUCTS CONTAINING A SHARP AND AUTO-INJECTORS**



ACCEPTED

Pre-loaded products containing a sharp and auto-injectors.

NOT ACCEPTED

Unwanted medicines that are not pre-loaded products containing a sharp or auto-injectors, inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

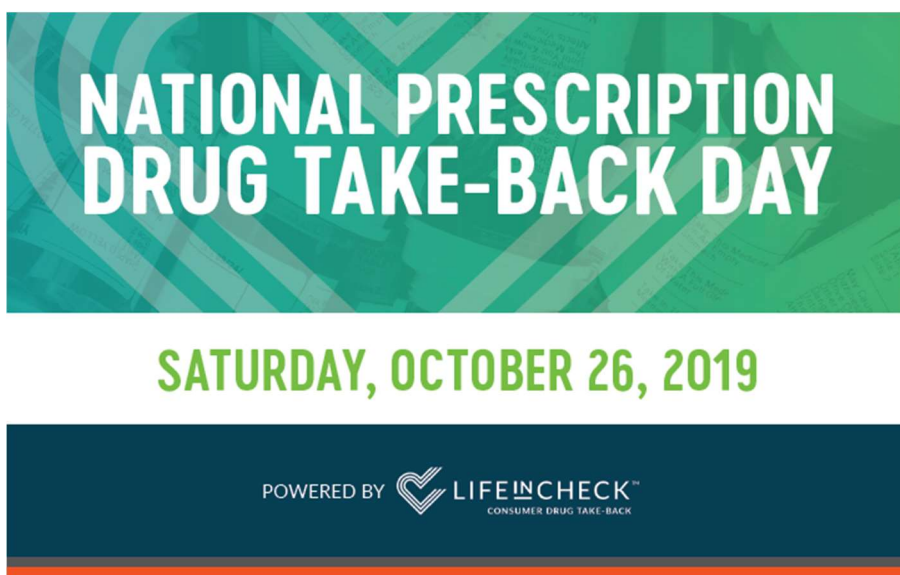
Note: Injector Mail-Back Packages can only be used for pre-filled injector products and cannot accept other types of items.

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

Appendix C: Promotion Material

Note: all promotional material will be updated upon coordination with other approved Plan Operators and these images are merely examples of the content that will be included.

1. Sample Education Materials



NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

- Unused or expired prescription medications are a public safety issue, leading to accidental poisoning, overdose, and abuse.
- Pharmaceutical drugs can be just as dangerous as street drugs when taken without a prescription or a doctor's supervision.
- The non-medical use of prescription drugs ranks second only to marijuana as the most common form of drug abuse in America.
- The majority of teenagers abusing prescription drugs get them from family and friends and the home medicine cabinet.
- Unused prescription drugs thrown in the trash can be retrieved and abused or illegally sold. Unused drugs that are flushed contaminate the water supply. Proper disposal of unused drugs saves lives and protects the environment.

TAKE-BACK PROGRAMS ARE THE BEST WAY TO DISPOSE OF OLD DRUGS.

But if a program is not available:

- Take the meds out of their bottles;
- Mix the medicines (do not crush tablets or capsules) with an unpalatable substance such as dirt, kitty litter, or used coffee grounds. This prevents thievery or diversion of medicines from the trash.
- Place the mixture in a container such as a zip-lock or sealable plastic bag, and throw the container away in your household trash.

FOR MORE INFORMATION ON PRESCRIPTION DRUG ABUSE, GO TO:

www.dea.gov
www.getsmartaboutdrugs.com
www.justthinktwice.com



GO TO
RXDISPOSAL.LIFEINCHECK.COM
TO FIND A RECEPTACLE NEAR YOU



**EVERY DAY IS CONSUMER
DRUG TAKE-BACK DAY**

Working together to protect our
families, communities and environment.

HOW IT WORKS

- 1 Pull to open drawer
Hale para abrir el cajón
- 2 Place medications inside
Coloque las medicinas adentro
- 3 Close the drawer
Cierre el cajón



**SAFELY DISPOSE OF
YOUR UNUSED OR
EXPIRED MEDICATIONS!**

DID YOU KNOW?

192 AMERICANS

die every day from
a drug overdose.*

*ohi.gov

46 MILLION

people at minimum, in 24 major
American metropolitan areas
are exposed to pharmaceutical
contaminated drinking water.

83% OF PEOPLE

who misuse prescription pain
relievers including opioids get them
from a friend, relative or others.*

*samhsa.gov

2. Sample Authorized Collector Marketing Support



STOP BY TO SAFELY
DISPOSE OF YOUR
UNUSED OR EXPIRED MEDS

83% OF PEOPLE WHO MISUSE PRESCRIPTION
PAIN RELIEVERS INCLUDING OPIOIDS GET THEM
FROM A FRIEND, RELATIVE OR OTHERS.

(WWW.SAMHSA.GOV)

46 MILLION AMERICANS ARE EXPOSED TO
TRACE AMOUNTS OF MEDICATIONS IN THEIR
DRINKING WATER.

(ASSOCIATED PRESS)

**SAFELY DISPOSE OF YOUR UNUSED
OR EXPIRED MEDICATIONS HERE**

For more information on safe drug storage and disposal, as well
as information on additional collection options,
visit rxdisposal.lifeincheck.com or call 1-800-123-4567

SPONSORED BY LIFEINCHECK

SOCIAL MEDIA

Twitter: Crafting the Perfect Tweet

Twitter is a simple way to quickly share short pieces of information. Twitter posts can be up to 140 characters in length, but 100 characters is the ideal length for maximum distribution. Including images in your tweets will make them stand out in the Twitter feed; these images should be 1084 x 512 pixels*.

Facebook: Appealing to Your Audience

Facebook allows you to share lengthier posts with slightly larger images. However, longer isn't always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 100 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 628 pixels.

SAMPLE POSTS

Copy and paste the following social media posts into your Facebook or Twitter to spread the word about the importance of properly managing leftover pharmaceuticals and drive people to your location. You can also combine them with some of the facts below to drive awareness of the importance of consumer drug take-back programs. Be sure to add one of the accompanying images and to fill in your location's name.

Announcing our new Consumer Drug Take-Back program to safely dispose of unused medications at OUR LOCATION.

OUR LOCATION wants to help you protect your loved ones, the community and the environment! Now you can dispose of unused meds here.

OUR LOCATION wants to help you protect your loved ones, the community and the environment by offering free unused meds disposal.

Got leftover meds? Drop them off at OUR LOCATION – free and easy.

Visit OUR LOCATION to drop off your leftover meds for free – no questions asked.

Leaving leftover drugs in the home can pose health and environmental dangers. Safely dispose of them today at OUR LOCATION!

Drop off your unwanted prescription and OTC meds in the green box at OUR LOCATION.

Rid your home of dangerous, leftover meds today. Bring them to OUR LOCATION to dispose of them safely – no questions asked!

Do you have leftover drugs in your medicine cabinet? Now you can dispose of them easily and safely at OUR LOCATION.

Safe prescription drug disposal is easy. Just find the green box in OUR LOCATION.

Do the right thing: don't flush your meds. Return leftover drugs to a safe take-back location like our green box at OUR LOCATION.

Do the right thing: don't flush your meds. Bring them to OUR LOCATION for proper disposal.

Protect your community – bring your leftover meds to a safe drug take-back program like ours at OUR LOCATION.

Help us stop the opioid epidemic. Dispose of your unused meds at OUR LOCATION.

DID YOU KNOW?

192 AMERICANS

die every day from a drug overdose.*

AT

**EVERYDAY IS CONSUMER DRUG
TAKE-BACK DAY**

Go to rxdisposal.Lifeincheck.com
to find a receptacle near you

*cdc.gov



LIFE IN CHECK™

**SAFELY DISPOSE OF
YOUR UNUSED OR
EXPIRED MEDICATIONS!**

WE ARE PARTICIPATING!

**NATIONAL PRESCRIPTION
DRUG TAKE-BACK DAY**

SATURDAY, OCTOBER 26, 2019

SPONSORED BY



LIFE IN CHECK™
CONSUMER DRUG TAKE-BACK

SAMPLE PRESS-RELEASE

Use the template included in the press release folder or copy and paste the below to customize your press release and send out to media outlets in your area.

FOR IMMEDIATE RELEASE

CONTACT:

[Insert contact name here]

[Insert contact's title here]

[Phone number]

[Contact or program email address]

[Web site url if you have a web site](#)

**[Insert pharmacy name] announces convenient drug takeback
program for leftover household medications**

[CITY, STATE, TODAY'S DATE] -- [PHARMACY NAME] announced today it has established a convenient medication takeback program for easy disposal of leftover, unused and out-of-date prescription and over-the-counter medications.

In an effort to help reduce the risk of drugs in the home that can potentially harm children, teens or adults, [PHARMACY NAME] has set up a secure, safe drop-off location in its pharmacy at [ADDRESS] in [CITY NAME].

Unused medications in the home are a source of drug abuse in millions of homes, with the opioid crisis in the United States fueled in part by that availability. More than 83 percent of opioid prescription medications taken by new users are obtained from a friend, relative or others. Overall, 192 Americans die every day from a drug overdose.

"We want to provide the folks in our community with the safe, secure opportunity to clean out their medicine cabinets and make their homes and communities safer," said [NAME OF PHARMACY MANAGER OR OWNER], of [PHARMACY NAME]. "We want to remind people that they should not flush drugs down the toilet. Traces of drugs can appear in community drinking water. Our drug disposal unit, which is easily accessible in the pharmacy, is a great answer to that problem and it's simple to do. All they do is just come in, look for the big green receptacle and take it from there. Drugs can be dropped off with no questions asked."

[PHARMACY MANAGER/OWNER'S LAST NAME] said there are some things that can't be taken in the receptacle, such as inhalers and needles, but pharmacy staff will be on hand to help determine what to do. The collection receptacle will be available in the pharmacy at [ADDRESS], [DAYS AND HOURS].

[PHARMACY NAME] partnered with Inmar to manage this drug take back program. The company has a long history as the industry leader in handling prescription and over-the-counter drug returns safely, securely and discreetly for major and regional chain drug stores as well as independent pharmacies and hospitals across the U.S.

3. Website Interface and Functionality



CONSUMER DRUG TAKE-BACK PROGRAM

 FIND YOUR NEAREST DRUG DISPOSAL LOCATION



Every day in America 1,000+ people are treated in emergency rooms for prescription drug abuse and 192 die from drug overdoses. According to the National Institute on Drug Abuse 18 million people in the U.S. over the age of 12 have misused medications at least once in the past year. The opioid epidemic is impacting communities and families across the US - from rural farm towns to highly populated urban areas and across every demographic.

JOIN US AND HELP FIGHT THE OPIOID EPIDEMIC

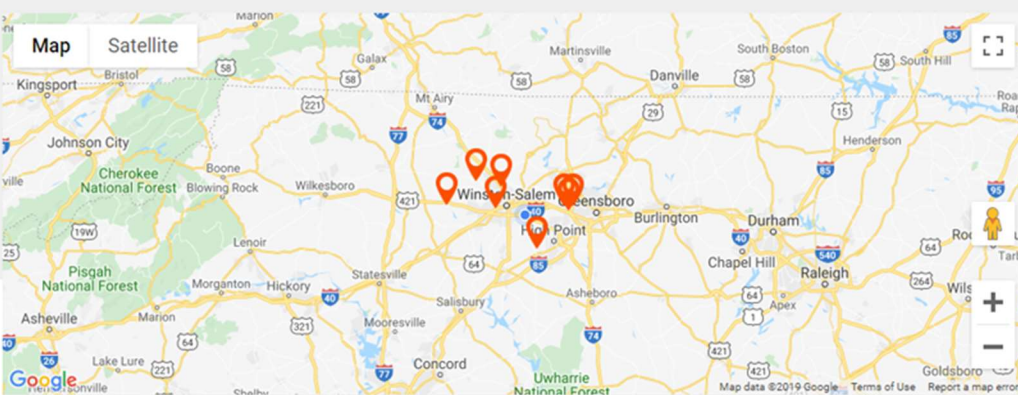
LifelnCheck Consumer Drug Take-Back is working to help educate Americans on the dangers of leaving prescription drugs unattended in the home. From diminishing the risk of drug abuse to helping protect the environment, disposing of your medications properly makes your community a healthier, safe place. **Simply enter your city and state or zip code and search radius and we will provide a list of safe drug disposal locations in your area.**

LOCATIONS


Location:

Distance:

FIND!



YOUR SEARCH RESULTS:

 **Southside Discount Pharmacy**
3085 Waughtown Street
Winston-Salem, NC 27107
[Get Directions](#)

 **Walkertown Family Pharmacy**
2905 DARROW RD
WALKERTOWN, NC 27051
[Get Directions](#)

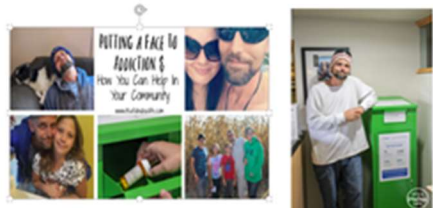
SHOW ALL RESULTS



4. Sample Social Influencer Content

"Recovery Is Possible + An Easy Way
You Can Help Fight The
Opioid Epidemic"

By It's a Fabulous Life



<http://itsafabulouslife.com/recovery-is-possible-an-easy-way-you-can-help-fight-the-opioid-epidemic/>

mom
UNLEASHED

HOME COOK CREATE EXPERIENCE INSPIRE

EASY WAYS TO KEEP PRESCRIPTION DRUGS SAFE: 3 SIMPLE STEPS EVERY PARENT SHOULD TAKE TODAY

MARCH 27, 2018 BY JEN KENNEDY

This blog has been sponsored by LifeInCheck, Inc. and is approved. All opinions are our own. #LIFEINCHECK

Facebook 100 Twitter 100 Instagram 100

I'll be honest, I've always been a worrier. Even as my kids get older, it's not at all uncommon for me to take looks at my home and feel eager to safeguard the dangers that I see. For not only my children but my entire family. I've always been this way but it's become more of a priority as the opioid crisis has risen and there have been more and more cases of children and adults alike not only getting their hands on prescriptions but selling and buying them. Of course I trust my kids and I know that they know the dangers of prescription drugs but as a parent, that does not absolve me from my task of making my home the safest place possible. That's why, in honor of April 27th 2018 being National Prescription Drug Take Back Day, I've been refreshing the way that I look at prescription drugs in my home and coming up with easy ways to keep prescription drugs safe.



LifeInCheck is Mom Unleashed, formerly The Mompreneur at LifeInCheck. I'm a mom of three and I'm also a professional. I'm also a mom of three and I'm also a professional. I'm also a mom of three and I'm also a professional.

LifeInCheck

April 10 at 2:55 PM · 🌐

Spring is the perfect time to declutter your space & dispose of unused or expired items. Follow these tips!



[HTTPS://THREECLEMENTINES.COM/EASY-TIPS-DECLUTTER-CLOSET/](https://threeclementines.com/easy-tips-declutter-closet/)
5 Easy Tips To Declutter Your Closet & Medicine Cabinet
What's the oldest date in your medicine cabinet?

👍👍👍 135

11 Comments 88 Shares

Like

Comment

Share

*Geo-targeted ads to store list zip codes and interest targeted ads to key terms such as: caregiver, home care, nursing, nursing home care, pharmacy, substance abuse prevention, rehabilitation hospitals, environmentalism, social responsibility, environmental protection, and social movements



Appendix D: Applicable Permits and Licenses

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
R90595946	04-30-2022	\$1850
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N,3, 3N,4,5	REVERSE DISTRIB-COLLECTOR	03-26-2021
123 COMPLIANT LOGISTICS, LLC 188 M ST SUITE B AGAWAM, MA 010012043		

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
UNITED STATES DEPARTMENT OF JUSTICE
DRUG ENFORCEMENT ADMINISTRATION
WASHINGTON D.C. 20537

Sections 304 and 1008 (21 USC 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
UNITED STATES DEPARTMENT OF JUSTICE
DRUG ENFORCEMENT ADMINISTRATION
WASHINGTON D.C. 20537

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Appendix E: Compliance History

TransChem Environmental has no violations, penalties or regulatory orders in the past 5 years.

Enforcement Action Summary Report

Facility Aragonite

<i>Date Recieved</i>	<i>Agency</i>	<i>Enforcement Type</i>	<i>Alleged Violation</i>	<i>Proposed Penalty</i>	<i>Status</i>	<i>Resolution Date</i>	<i>Penalty Paid</i>
10/20/2016	UDEQ	Notice of Violation	1) Storage facility for water supply had a leak at the time of inspection, 2) the public water supply storage vessel showed signs of a leak.	\$0.00	Resolved w/o Penalty	12/14/2016	\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>	Repaired the tanks.			
2/8/2017	UDEQ - DDW	Notice of Violation	Failure to monitor and report for pesticides and volatile organic compounds in 2016.	\$0.00	Resolved w/o Penalty	2/15/2017	\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>	Updated testing was conducted.			
5/16/2018	UDEQ - Division of Air Quality	Notice of Violation	Failure to submit stack test results, deviation reports, leak detection and repair reports, Benzene NESHAP reports, semi-annual reports and compliance certifications in a timely manner.	\$23,750.00	Resolved	5/21/2018	\$23,750.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>				

1/28/2019	US DEA	Notice of Violation	1) Failure to file annual inventory, 2) delinquent filing of quarterly ARCOS reports, failure to maintain a separate file for Schedule 1 and 2 and Schedule 3 through five controlled substances, 4) failure to record time of annual inventory.	\$120,000.00	Resolved	5/8/2019	\$96,000.00
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EA Number:

Description of Resolution:

Payment of a civil penalty.

9/26/2019	Utah Department of Commerce	Penalty Notice	Failure to report to the division any adverse action taken by another licensing jurisdiction.	\$300.00	Resolved	10/10/2019	\$300.00
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EA Number:

Description of Resolution:

Paid civil penalty

1/23/2020	UDEQ	Compliance Advisory	The facility's Public Water System rating is expected to be downgraded for the following deficiencies: 1) area within 50 feet of a storage tank not graded to prevent standing water, 2) lack of an approved DWSP plan at two locations.	\$0.00	Pending		\$0.00
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EA Number:

Description of Resolution:

4/8/2020	UDEQ	Notice of Violation	29 alleged violations resulting from the annual inspection conducted in the Fall 2019.	\$106,840.00	Pending		\$0.00
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EA Number:

2001004

Description of Resolution:

7/15/2020	Alabama Board of Pharmacy	Consent Administrative Order	1) Conducting operations in the State but failing to timely renew a permit, 2) Failure to conduct business in accordance with the State rules because of violations settled with the US DEA in January 2019.	\$10,000.00	Resolved	8/10/2020	\$10,000.00
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<i>EA Number:</i>	19-L-0162	<i>Description of Resolution:</i>	Paid a civil penalty.
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8/31/2020	US EPA	Warning Letter/Notice	Incineration of materials in violation of the prohibition on dilution of certain hazardous wastes by incineration.	\$0.00	Pending		\$0.00
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<i>EA Number:</i>		<i>Description of Resolution:</i>	
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12/9/2020	Alabama Board of Pharmacy	Compliant	1) Failure to disclose an enforcement action in another jurisdiction on a permit application and applicable Alabama Board of Pharmacy rules violations from lack of disclosure.	\$2,000.00	Resolved	2/24/2021	\$2,000.00
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<i>EA Number:</i>	20-L-0097	<i>Description of Resolution:</i>	Paid an administrative penalty.
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12/15/2020	Arizona Board of Pharmacy	Penalty Notice	Failure to notify the Board of a prior enforcement action in another jurisdiction.	\$250.00	Resolved	1/26/2021	\$250.00
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<i>EA Number:</i>		<i>Description of Resolution:</i>	Entered into a consent order.
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1/15/2021	US EPA	Warning Letter/Notice	1) Failure to monitor emissions from the Corrosives Unit, Blended Waste Feed, Aqueous Waste Feed, and Sludge Waste Feed operation, 2) 24 open ended valves on the carbon system, 3) a rupture disk operating above the no detectable emissions standard, 4) Failure to record the date of first repair attempt, 5) Excess emissions from 12 pressure relief devices and 5 connectors, 6) Failing to record information on equipment tagged for repair, 7) Storing light liquid material in containers that had leaks, 8) Failure to adequately train employees to conduct Method 21 monitoring, 9) Failure to use equipment that adequately monitors for Method 21, 10) Failure to repair 3 pieces of equipment in 15 days.	\$470,000.00	Pending	\$0.00
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EA Number:

Description of Resolution:

2/26/2021	Bureau of Alcohol, Tobacco and Fire Arms	Warning Letter/Notice	Failure to timely/accurately enter all required explosive inventory identification and quantity information in a daily summary of magazine transaction (per magazine)	\$0.00	Resolved w/o Penalty	2/26/2021	\$0.00
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EA Number:

Description of Resolution:

Provided corrective actions to the Agency.

3/26/2021	UDEQ	Notice of Violation	12 alleged violations related to permit conditions on waste storage conditions, timing, training and rejection procedures identified during the 2020 annual inspection.	\$0.00	Pending	\$0.00
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EA Number:

NOV 2102003

Description of Resolution:

Enforcement Action Summary Report

Facility El Dorado

Date Recieved	Agency	Enforcement Type	Alleged Violation	Proposed Penalty	Status	Resolution Date	Penalty Paid
3/14/2019	ADEQ	Notice of Violation	1) Allowing water to remain in secondary containment longer than 24 hours, thus impeding the ability to monitor for leaks, 2) failure to properly document inspections for secondary containment.	\$8,000.00	Resolved	5/17/2019	\$8,000.00
<div> <div>EA Number:</div> <div>LIS 19-048</div> <div>Description of Resolution:</div> <div>Entered into the administrative consent order.</div> </div>							
11/21/2019	ADEQ	Notice of Violation	1) Opacity issues at kiln 1, 2) Opacity issues at kiln 2 and 3) Open diverts at kiln 2 require additional explanation to the air regulators.	\$10,020.00	Resolved		\$6,513.00
<div> <div>EA Number:</div> <div>LIS 21-120</div> <div>Description of Resolution:</div> <div>Paid a civil penalty and provided ergonomic hose reloading equipment to the El Dorado fire department.</div> </div>							
12/9/2019	Delaware Dept. of Natural Resources	Notice of Violation	Failure to provide the Department of Natural Resources with facility copies of infectious waste manifests received from Delaware generators.	\$0.00	Resolved w/o Penalty	1/8/2020	\$0.00
<div> <div>EA Number:</div> <div>19-SW-43</div> <div>Description of Resolution:</div> <div>Supplied the required manifests.</div> </div>							

8/25/2020	ADEQ	Warning Letter/Notice	Discharge exceedance of the effluent limitation for Mercury at the 007 outfall during the 2nd Quarter of 2020.	\$0.00	Pending		\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>				
8/31/2020	US EPA	Warning Letter/Notice	Incineration of materials in violation of the prohibition on dilution of certain hazardous wastes by incineration.	\$0.00	Pending		\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>				
10/22/2020	ADEQ	Warning Letter/Notice	Mercury stormwater exceedance.	\$0.00	Pending		\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>				
2/11/2021	FRA	Notice of Non-Compliance	A rail car not sealed appropriately because the bolts on the manway were not tool tight.	\$5,000.00	Resolved	3/11/2021	\$4,000.00
		<i>EA Number:</i>	FRA No. ZCED 2020-1(HMT)	<i>Description of Resolution:</i>		Paid civil penalty.	
2/19/2021	FRA	Notice of Non-Compliance	Bolts on a rail car manway were not tool tight.	\$2,000.00	Resolved	3/11/2021	\$1,500.00
		<i>EA Number:</i>	FRA No. ZCED 2020-2(HMT)	<i>Description of Resolution:</i>		Paid civil penalty.	

3/30/2021	ADEQ	Notice of Violation	1) Storage of rejected explosives while waiting to obtain transportation permits to remove them from the site.	\$0.00	Dismissed	5/25/2021	\$0.00
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EA Number:

Description of Resolution:

Arkansas DEQ withdrew the alleged violation due to extenuating circumstances.

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
2/15/2017	ATF		No Violations	
3/9/2017	CAA	TCEQ	<p>Alleged Violations:</p> <p>1.) Failure to maintain the Carbon Monoxide incinerator.</p> <p>2.) Failure to maintain Carbon Monoxide emissions of 100 parts per million by volume (ppmv) at the incinerator.</p> <p>3.) Failure to maintain incinerator minimum combustion temperatures.</p> <p>4.) Failure to maintain Arsenic and Chormium emission rates at the Incinerator.</p> <p>5.) Failure to maintain combined Cadmium-Lead and combined Arsenic-Beryllium-Chromium emissions at the Incinerator.</p> <p>6.) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour during start-up at the Incinerator.</p>	<p>4/18/2017 Received NOV</p> <p>5/27/2017 Submitted Corrective Action Plan</p> <p>9/29/2017 Received a letter from the TCEQ stating adequate compliance documentation was received and no further action required</p>
6/15/2017	TPDES	TCEQ	No Violations - Three Areas of Concern	8/9/2017 Received a letter from the TCEQ stating no violations are alleged.
2/22/2018	OPCC	TCEQ	<p>Alleged Violations</p> <p>1.) Failure to maintain the CO emission rate at the Incinerator.</p> <p>2.) Failure to limit Carbon Monoxide concentration at 100 parts per million by volume (ppmv) at the</p> <p>3.) Failure to maintain Incinerator minimum combustion temperatures.</p> <p>4.) Failure to maintain Beryllium, Selenium, and Chromium emission rates at the Incinerator.</p>	<p>4/26/2018 Received Notice of Violation.</p> <p>5/25/2018 Submitted a Response to NOV.</p> <p>10/15/2018 Received a letter from TCEQ stating no further action required.</p>

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
			5.) Failure to limit combined Arsenic-Beryllim-Chromium emissions at the Incinerator. 6.) Failure to maintain Mercury emission rates at the Incinerator. 7.) Failure to limit Mercury emissions at the Incineraotr. 8.) Failure to maintain the Hazardous Wsate Permit miminum voltage requirements at the Ionizing Wet Scrubber. 9.) Failure to maintain EPA and Hazardous Waste Permit minimum voltage requirments at the Ionizing Wet Scrubber (IWS) equipment.	
6/13-21/2018	RCRA	TCEQ	Alleged Violations 1.) Failure to maintain inspection records as required by permit. 2.) Failure to Maintain aisle space to allow unobstructed movement of personnel and emergency response equipment. Additional Issues 3.) A concern the regulated entity may not be meeting the requirements of properly maintaining an accuarate storage inventory amount. 4.) The concern is the regulated entity may not be meeting the requirements of properly storing incompatible waste.	9/21/2018 Submitted a response to TCEQ. 1/4/2019 Received Letter from TCEQ stating no further action required.

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
7/18/2018	Transportation Ten Day Yard	TCEQ	No Issues Found	
			1.) Paperwork Error on the Chain of Custody	10/19/2018 Posted required public notice in all Veolia Port Arthur Buildings 10/22/2018 Submitted copy of Monitoring Violation Public Notice and Certificate of Delivery to TCEQ. No further action required.
1/17/2019	CAA	TCEQ	<p>Alleged Violations</p> <p>1.) Failure to maintain tons per year emissions for permitted sources on a 12 month rolling period basis.</p> <p>2.) Failure to maintain the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS) equipment.</p> <p>3.) Failure to comply with the EPA and the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS) equipment.</p> <p>4.) Failure to comply with the EPA minimum kilovolts-amps requirement at the Wet Electrostatic Precipitator (WESP).</p> <p>5.) Failure to maintain the CO emission rate at the Incinerator (EPN INCINSTK).</p> <p>6.) Failure to limit Carbon Monoxide concentration to 100 parts per million by volume (ppmv) at the Incinerator.</p> <p>7.) Failure to maintain Incinerator minimum combustion temperatures.</p>	<p>3/18/2019 Received NOV letter</p> <p>4/25/2019 Submitted Corrective Action Plan</p> <p>10/1/2019 Received letter from TCEQ stating no further action required.</p>

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
			8.) Failure to certify the Permit Compliance Certification. 9.) Failure to report all instances of deviations.	
6/25/2019	LQG/UIC/Ten day facility	TCEQ	No Alleged Violations	8/1/2019 Received Letter from TCEQ stating no violations are being alleged.
12/16/2019	DEA	DEA	DEA controlled substances inventory was not conducted. No DEA controlled substances were present at the Veolia site at the time.	1/17/2020 Veolia submitted a formal biennial inventory of controlled substances to the DEA. The inventory was zero(0).
1/22/2020	Foreign Soil Permit	USDEA	No Alleged Violations	
2/14/2020	TSD/LQG/Used Oil	TCEQ	Alleged Violations 1.) Failure to follow the Waste Analysis Plan 2.) Failure to separator protect storage containers holding hazardous waste that is incompatible with any waste or other material stored nearby in other containers. 3.) Failure to provide the hazardous waste accumulation (>1 year) was solely for the purpose of holding of such quantities of hazardous waste as are necessary to facilitate proper disposal. 4.) Failure to post the "TCEQ Permit Unit No. _" sign at the permitted facility unit. 5.) Failure to maintain disposal records for the disposal of waste oil. 6.) Failure to maintain adequate (e.g., include inspector's full name and time of inspection) monthly safety inspection records (e.g., fire extinguishers, first aid	6/12/2020 Received NOV Letter 7/15/2020 Submitted Corrective Action Plan to TCEQ. 10/26/2020 Received No Further Action Letter

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
			kits, Self-Contained Breathing Apparatus (SCBA), showers, and Table III.E.3. - Emergency Equipment of the Contingency Plan) for a period of 3 years. records of the Protective Gear Designated for Emergency Use. 8.) Failure to maintain the date and nature of any repairs or other remedial actions documented on the weekly Container Storage Areas inspections. 9.) Failure to follow a written schedule for inspecting security devices.	
2/14/2020	UIC	TCEQ	No Alleged Violations	
2/14/2020	Transfer Facility Compliance	TCEQ	No Alleged Violations	3/2/2020 Received letter from the TCEQ stating no alleged violations.
2/26/2020	Public Drinking Water	TCEQ	Alleged Violation 1.) Failure to perform maintenance and housekeeping practices used by a PWS to ensure the good working condition and general appearance of the systems' facilities and equipment. Area of Concern 1.) Failure to have a complete and up-to-date monitoring plan.	6/29/2020 Received NOV letter from TCEQ. 7/22/2020 Submitted Corrective Action Plan to TCEQ. 11/24/2020 Received letter from TCEQ stating no further action required.
3/2/2020	OPCC	TCEQ	Alleged Violations 1. -3.) Failure to comply with the EPA and the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS)	6/9/2020 Received NOV letter 7/8/2020 Submitted Corrective Actin Plan to TCEQ. 10/20/2020 Received letter from TCEQ stating no further action required.

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
			<p>equipment.</p> <p>4.) Failure to maintain the CO emission rate of 17.10 pounds per hour at the Incinerator (EPN INCINSTK).</p> <p>to 100 parts per million by volume (ppmv) at the Incinerator.</p> <p>6. - 7.) Failure to maintain Incinerator minimum combustion temperatures.</p> <p>8.) Failure to comply with the EPA minimum kilovolts-amps requirement at the Wet Electrostatic Precipitator (WESP).</p> <p>9.) Failure to conduct leak detection and repair monitoring.</p>	
8/4/2020	Wastewater	TCEQ	<p>Alleged Violations</p> <p>1.) Failure to report any effluent violation that deviates from the permitted effluent limitation by more than 40% to the Regional office and the Enforcement Division within five working days of becoming aware of the noncompliance. The noncompliance occurred in September 2019.</p>	<p>8/7/2020 Submitted noncompliance notifications to the TCEQ.</p> <p>9/30/2020 Received letter from TCEQ stating no further action required.</p>
12/11/2020	RCRA	TCEQ	No Violations	
1/6-8/2021	ATF		No Violations	
1/11/2021	OPCC	TCEQ	<p><u>Alleged Violations - NOV</u></p> <p>1.) Failure to maintain an emission rate below the</p>	<p>1/27/2021 Received Notice of Violation</p> <p>1/27/2021 Received Notice of Enforcement</p>

**VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
PORT ARTHUR, TX**

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
			allowable Carbon Monoxide (CO) emission limits of 17.1 pounds per hour (lbs/hr) from Emission Point Number (EPN) INCINSTK. 2.) Failure to maintain the CO gas concentration below 100 parts per million by volume (ppmv) at the EPN INCINSTK. 3.) Failure to maintain the EPA and the Hazardous Waste Permit minimum voltae of 10 kilovolts at the Ionizing Wet Scrubber (IWS) equipment. 4.) Failure to maintain the EPA minimum kilovolts-amps requirement of 15.8 kVA at the Wet Electrostatic Precipitator (WESP). 5.) Failure to comply with the EPA and the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS) equipment. <u>Violations - NOE</u> 1.) Failure to maintain emissions below the allowable Caron monoxide (CO) emission limit of 17.1 lbs/hr from EPN INCINSTK.	2/3/2021 Submitted a request to reconsider Enforcement based on significant improvements over the past three years. 4/16/2021 Received Proposed Agreed Order 7/13/2021 Submitted a signed agreement order and penalty payment of \$3,420.
11/9-10/2021	RCRA	TCEQ	Alleged Violations 1.) The investigator observed three Waste Determination records which have been marked incorrectly, in a manner which indicated the wastes would be hazardous and these wastes were Industrial Class 1 and Class 2. The waste determinations were corrected.	

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.
PORT ARTHUR, TX

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
			2.) Failure to place a Waste Stream Identification/ classification of the waste on Manifest 001968617VES	

Clean Harbors – Aragonite Compliance History

Compliance history provided via ECHO.EPA.GOV

<https://echo.epa.gov/detailed-facility-report?fid=110000906985#history110000906985>

SourceID	Statute	Status Type	Violation	Violation Type	Violation Date
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	03/26/2021
UTD981552177	RCRA	Violation	Manifest System-Recordkeeping, Rptg, Notifying	267.E	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	TSD - Tank System Standards	264.J	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	03/26/2021
UTD981552177	RCRA	Violation	LDR - General	268.A	03/26/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2020
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2020
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	04/08/2021
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	04/08/2021
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	04/08/2021
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	04/08/2021
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	04/08/2021
UTD981552177	RCRA	Violation	State Statute or Regulation	XXS	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	04/08/2021
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	04/08/2021

UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	04/08/2021
UTD981552177	RCRA	Violation	State Statute or Regulation	XXS	04/08/2021
UTD981552177	RCRA	Violation	Listing- Air Emisions Standards-Tanks/Containers	261.CC	04/08/2021
UTD981552177	RCRA	Violation	TSD - Incinerator Standards	264.O	04/08/2021
UTD981552177	RCRA	Violation	TSD - Incinerator Standards	264.O	04/08/2021
UTD981552177	RCRA	Violation	Generators - General	262.A	04/08/2021
UTD981552177	RCRA	Violation	Generators - General	262.A	04/08/2021
UTD981552177	RCRA	Violation	LDR - General	268.A	04/08/2021
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Specific - Boilers and Industrial Furnaces	266.H	05/30/2019
UTD981552177	RCRA	Violation	Generators - General	262.A	05/30/2019
UTD981552177	RCRA	Violation	Generators - Records/Reporting	262.D	05/30/2019
UTD981552177	RCRA	Violation	LDR - Storage Prohibitions	268.E	05/30/2019
UTD981552177	RCRA	Violation	Universal Waste - Large Quantity Handlers	273.C	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019

UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Specific - Boilers and Industrial Furnaces	266.H	05/30/2019
UTD981552177	RCRA	Violation	Generators - General	262.A	05/30/2019
UTD981552177	RCRA	Violation	Generators - Manifest	262.B	05/30/2019
UTD981552177	RCRA	Violation	Generators - Manifest	262.B	05/30/2019
UTD981552177	RCRA	Violation	Generators - Records/Reporting	262.D	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	05/30/2019
UTD981552177	RCRA	Violation	Transporters - General	263.A	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	State Statute or Regulation	XXS	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Transporters - General	263.A	05/30/2019
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	05/30/2019
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	State Statute or Regulation	XXS	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019

UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	LDR - General	268.A	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Specific - Boilers and Industrial Furnaces	266.H	05/30/2019
UTD981552177	RCRA	Violation	Generators - Pre-transport	262.C	05/30/2019
UTD981552177	RCRA	Violation	Universal Waste - Large Quantity Handlers	273.C	05/30/2019
UTD981552177	RCRA	Violation	State Statute or Regulation	XXS	05/30/2019
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	TSD - Container Use and Management	264.I	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - Manifest/Records/Reporting	264.E	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	LDR - General	268.A	05/30/2019

UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Generators - Manifest	262.B	05/30/2019
UTD981552177	RCRA	Violation	Generators - General	262.A	05/30/2019
UTD981552177	RCRA	Violation	LDR - General	268.A	05/30/2019
UTD981552177	RCRA	Violation	Used Oil - Burners of Off-Spec for Energy Recovery	279.G	05/30/2019
UTD981552177	RCRA	Violation	Universal Waste - Large Quantity Handlers	273.C	05/30/2019
UTD981552177	RCRA	Violation	Used Oil - Burners of Off-Spec for Energy Recovery	279.G	05/30/2019
UTD981552177	RCRA	Violation	TSD IS-Container Use and Management	265.I	05/30/2019
UTD981552177	RCRA	Violation	Generators - Records/Reporting	262.D	05/30/2019
UTD981552177	RCRA	Violation	Universal Waste - Large Quantity Handlers	273.C	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	Permit Condition or Requirement	PCR	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	05/30/2019
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	08/14/2018
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	08/14/2018
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	08/14/2018
UTD981552177	RCRA	Violation	TSD - Air Emission Standards - Tanks/SI/Containers	264.CC	09/10/2019
UTD981552177	RCRA	Violation	TSD - General Facility Standards	264.B	09/10/2019
UTD981552177	RCRA	Violation	TSD - Preparedness and Prevention	264.C	09/10/2019

Clean Harbors – El Dorado Compliance History

Compliance history provided via ECHO.EPA.GOV

<https://echo.epa.gov/detailed-facility-report?fid=110000521221>

SourceID	Statute	Status Type	Violation	Violation Type	Violation Date
ARD069748192	RCRA	Violation	Generators - General	262.A	09/03/2021
ARD069748192	RCRA	Violation	Generators - Pre-transport	262.C	07/22/2019
ARD069748192	RCRA	Violation	TSD - Preparedness and Prevention	264.C	07/22/2019
ARD069748192	RCRA	Violation	Generators - Pre-transport	262.C	07/22/2019
ARD069748192	RCRA	Violation	Generators - Pre-transport	262.C	07/22/2019
ARD069748192	RCRA	Violation	TSD IS-Container Use and Management	265.I	07/22/2019
ARD069748192	RCRA	Violation	TSD - Container Use and Management	264.I	07/22/2019
ARD069748192	RCRA	Violation	TSD - Container Use and Management	264.I	07/22/2019
ARD069748192	RCRA	Violation	Permit Condition or Requirement	PCR	07/22/2019
ARD069748192	RCRA	Violation	Permit Condition or Requirement	PCR	07/22/2019
ARD069748192	RCRA	Violation	TSD - Tank System Standards	264.J	07/22/2019
ARD069748192	RCRA	Violation	TSD - Tank System Standards	264.J	07/22/2019
ARD069748192	RCRA	Violation	TSD - Air Emission Standards for Equipment Leaks	264.BB	07/22/2019
ARD069748192	RCRA	Violation	Permit Condition or Requirement	PCR	04/15/2019
ARD069748192	RCRA	Violation	TSD IS-Tank System Standards	265.J	08/10/2018
ARD069748192	RCRA	Violation	TSD IS-Tank System Standards	265.J	08/10/2018
ARD069748192	RCRA	Violation	TSD - Tank System Standards	264.J	09/03/2021
ARD069748192	RCRA	Violation	TSD - Tank System Standards	264.J	09/03/2021
ARD069748192	RCRA	Violation	Generators - General	262.A	09/03/2021
ARD069748192	RCRA	Violation	Generators - General	262.A	09/03/2021
ARD069748192	RCRA	Violation	Significant Noncomplier	001	08/10/2018

Veolia – Port Arthur Compliance History

Compliance history provided via ECHO.EPA.GOV

<https://echo.epa.gov/detailed-facility-report?fid=110035783658>

SourceID	Statute	StatusType	Violation	Violation Type	Violation Date
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020

TXD000838896	RCRA	Violation	LDR - General	268.A	02/14/2020
TXD000838896	RCRA	Violation	LDR - Storage Prohibitions	268.E	02/14/2020
TXD000838896	RCRA	Violation	Permits - General Information	270.A	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020
TXD000838896	RCRA	Violation	TSD - General Facility Standards	264.B	02/14/2020
TXD000838896	RCRA	Violation	TSD - Container Use and Management	264.I	02/14/2020
TXD000838896	RCRA	Violation	State Statute or Regulation	XXS	02/14/2020