MED-Project®

Medication Education & Disposal

A Product Stewardship Plan for Unwanted Medicine from Households

Alameda County, California June 29, 2022; Revised August 31, 2022

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I. Contact Information

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II. Introduction

MED-Project LLC ("MED-Project"), on behalf of the participating companies identified in <u>Appendix A</u>, submits this Product Stewardship Plan ("Plan") for Unwanted Medicine to the Alameda County Department of Environmental Health ("Department") in compliance with the Alameda County Safe Drug Disposal Ordinance, Title 6 of the Alameda County Health and Safety Code Sections 6.53.010 through 6.53.120, as amended February 2, 2016 ("Ordinance") and the Alameda County Safe Drug Disposal Regulations, as amended October 16, 2013 ("Regulations"). The Ordinance requires pharmaceutical Producers¹ to develop a Product Stewardship Program to finance and manage the collection, transportation, and disposal of Unwanted Medicine from Alameda County households.

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

III. Plan Definitions

Board of Pharmacy is the California State Board of Pharmacy.

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

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

County means Alameda County, California.

DEA is the U.S. Drug Enforcement Administration.

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

DOT is the U.S. Department of Transportation.

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

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

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

Kiosk Drop-Off Site is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine, including On-Demand Collection Service Kiosk Drop-Off Sites and Scheduled Collection Service Kiosk Drop-Off Sites.

Kiosk Drop-Off Site Host is the designated contact person or persons at the Kiosk Drop-Off Site, including On-Demand Collection Service Kiosk Drop-Off Site Hosts and Scheduled Collection Service Kiosk Drop-Off Site Hosts.

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

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

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

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

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

On-Demand Collection Service is a service model where Unwanted Medicine Kiosk Drop-Off Site staff manage removal and packaging of full Unwanted Medicine inner liners prior to transfer to a common carrier for transport to a reverse distributor.

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

Scheduled Collection Service is a service model where MED-Project provides for a vendor service technician to help prepare Unwanted Medicine inner liners at Unwanted Medicine Kiosk Drop-Off Sites for transfer to a common carrier for transport to a reverse distributor.

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

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

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

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

Unwanted Medicine is defined in Section IV of this Plan.

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

IV. Unwanted Medicine

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

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

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

V. Collection of Unwanted Medicine

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

A. Unwanted Medicine Collection Program

1. Outreach

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

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

2. Implementation

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

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

3. Convenience

Mail-Back Services are available upon request by disabled and home-bound Residents, or persons providing services to such Residents, via the Call Center and MED-Project Website, thereby offering more opportunities to dispose of Unwanted Medicine.

4. Services

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

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

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

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

Mail-Back Services are available to disabled and home-bound Residents, or to persons providing services to such Residents, via the Call Center and MED-Project Website. *See* Section V.F for more information about the availability of Mail-Back Services.

B. Kiosk Drop-Off Sites

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

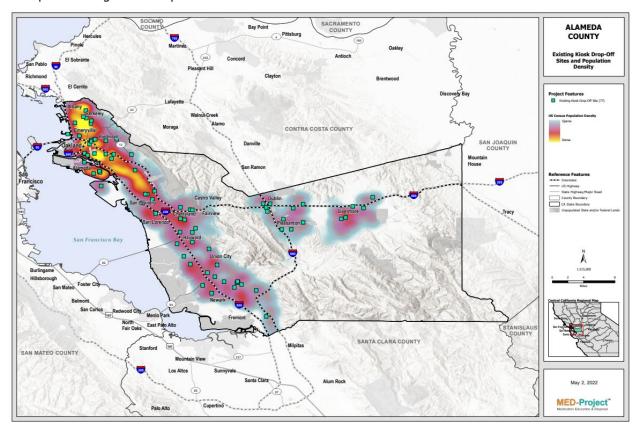
1. Kiosk Drop-Off Site Locations

Kiosk Drop-Off Sites that are currently interested in and participating in the Program are identified in <u>Appendix C</u>.

MED-Project continues outreach to potential Kiosk Drop-Off Site Hosts that are not interested in or participating in the Program, such as sites listed in <u>Appendix D</u>.

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

A map of existing Kiosk Drop-Off Sites is below.



2. Drop-Off Site Kiosk Placement and Maintenance Program

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

The maintenance program addresses items such as:

- Periodic inspection of kiosks to monitor general wear and tear;
- Unwanted Medicine Service Technician access to the kiosks at Scheduled Collection Service Kiosk Drop-Off Sites during the regularly scheduled Collection Service;
- Reporting by the Kiosk Drop-Off Site Host of damage to a kiosk or requested maintenance service.

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

3. Kiosk Specifications

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

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

The design of the pharmacy kiosk and signage (<u>Appendix E</u>) satisfies these requirements through the use of heavy gauge steel; multiple locking mechanisms, including a locking mechanism on the drop-slot; a tamper-resistant slot; and commercial hinges. The design increases the likelihood of consumer participation by providing easy access to wheelchair users. The locking mechanism on the drop-slot prevents kiosk overflow once the container has reached its maximum level and is locked by the Kiosk Drop-Off Site employee. MED-Project pharmacy kiosks come with appropriate regulatory signage and instructions, including an instruction to remove personal information from any Unwanted Medicine and packaging before depositing them and language required under the DEA Rule³ and by the Board of Pharmacy. Kiosk signage provides information about what is and is not accepted in the kiosk.

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

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

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

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

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

4. Kiosk Collection

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

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

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

MED-Project's Kiosk Drop-Off Site collection system complies with these DEA requirements for pharmacy and LEA Kiosk Drop-Off Sites. Vendor, pharmacies, and LEAs participating in the Program will keep all records required under the DEA Rule, including those required under DEA Rule §§ 1304 and 1317.35. Pharmacies participating in the Program will also keep all records required under Board of Pharmacy requirements. Pharmacy Kiosk Drop-Off Sites and Vendor will be instructed never to count, sort, inventory, or individually handle kiosk contents. MED-Project's Kiosk Drop-Off Site collection system will also comply with all applicable Board of Pharmacy requirements.

5. Collection Methods

A Kiosk Drop-Off Site Host may choose to participate in the program via either the Scheduled Collection Service method or On-Demand Collection Services method, the latter of which is dependent upon the Department's approval of a Petition for Exception. For both methods, MED-Project provides for the collection, transport, and disposal of Unwanted Medicine at no cost to the Kiosk Drop-Off Site.

If a Kiosk Drop-Off Site Host elects to participate via the On-Demand Collection Services method and receives Departmental approval of a Petition for Exception, the Kiosk Drop-Off Site employees shall

prepare the inner liner for shipment. On-Demand Collection Services enables a Kiosk Drop-Off Site Host to directly control the timing for servicing the kiosk and are able to seal the liner for packaging and transport at a time of their choosing. The Kiosk Drop-Off Site employees can schedule a common carrier to pick up the packaged inner liner or can offer the packaged inner liner during a regular common carrier pick up. This method enables the Kiosk Drop-Off Site to avoid disruptions to operations that may result from Vendor-scheduled visits or storage limitations.

If a Kiosk Drop-Off Site Host elects to participate via the Scheduled Collection Service method, an Unwanted Medicine Service Technician will regularly come to the Kiosk Drop-Off Site to help prepare the inner liner for shipment and disposal.

Kiosk Drop-Off Sites that are taking part in the Scheduled Collection Service pick-up method will have regular year-round scheduled time for pick up by a common carrier based on the specific location's business hours and weight of collected medications.

6. Kiosk Service

When servicing a kiosk at a Kiosk Drop-Off Site, two On-Demand Collection Services Kiosk Drop-Off Site employees or an Unwanted Medicine Service Technician under the supervision of two Scheduled Collection Service Kiosk Drop-Off Site employees following instructions provided by Vendor will:

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

If the package with the sealed inner liner is prepared before pick-up, the Kiosk Drop-Off Site Host store the inner liner in compliance with all applicable laws, regulations, and other legal requirements until Carrier pick-up.

7. Frequency of Pick-Up

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

8. Procedures if a Kiosk is Full Prior to Scheduled Pick-Up

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

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

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

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

C. Rapid Response Support

An unplanned event may necessitate a service at a Kiosk Drop-Off Site. A major event, such as a flood, earthquake, or fire, may jeopardize the security characteristics of the kiosk as well as the structural integrity of the Kiosk Drop-Off Site. Such events may require the involvement of law enforcement, fire, or other emergency service personnel. Kiosk Drop-Off Site employees will be directed to call 911 in situations posing an immediate threat to the environment or health. Once the area is safe for access, if needed, Vendor will dispatch Rapid Responders to secure the kiosk and remove its contents.

Vendor maintains a network of Rapid Responders that can be contacted in the case of an incident or other event requiring a Rapid Response. Vendor is able to respond within two to three hours in most cases when notified of a need for a Rapid Response. Rapid Responders will bring all necessary equipment to manage the specific needs of the Kiosk Drop-Off Site requiring a Rapid Response.

Along with major event preparedness, Vendor provides timely responses to events that may cause an inconvenience to the Kiosk Drop-Of Site. In situations requiring Rapid Response that do not require the involvement of emergency service personnel, the Kiosk Drop-Off Site Host will place a service request through the Help Desk. If the request does not require a Rapid Response, Vendor will typically respond within two to three business days of the event.

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

D. Take-Back Events

MED-Project will conduct Take-Back Events in coordination with HHW events throughout the County. MED-Project may also conduct Take-Back Events upon request by LEAs. LEA employees shall oversee all

Take-Back Events. MED-Project will confirm and/or finalize the locations and dates to conduct Take-Back Events once contracts with overseeing LEAs have been executed.

Due to the changing schedule of Take-Back Events, the list of dates and locations will be maintained on the MED-Project Website as events are scheduled and confirmed. Annually, MED-Project will review the gaps in coverage and convenience that may exist, as well as progress being made against set collection goals to determine the need for Take-Back Events.

1. Method

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

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

2. Procedures

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

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

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

Following the completion of each event, containers will be weighed, securely packaged, labeled, transported from the event site to the LEA site, and shipped in compliance with all applicable laws, regulations, and other legal requirements. Law enforcement officers will maintain control and custody of all Unwanted Medicine collected at Take-Back Events while it is transported to the point of secure transfer, storage or destruction. Containers and inner liners will be tracked via unique identifiers to a

facility identified in Section X, where they shall be incinerated. Vendor will ship the containers (and inner liners) in accordance with the requirements outlined in Section XII.B.

E. Disposal of Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events

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

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

F. Mail-Back Services for Unwanted Medicine

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

- Standard Mail-Back Services for disabled and home-bound Residents or persons providing services to such Residents as described in Section V.F.1;
- Inhaler Mail-Back Services for the collection of inhalers for disabled and home-bound Residents or persons providing services to such Residents as described in Section V.F.2.

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

1. Standard Mail-Back Services for Unwanted Medicine

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

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

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

Ultimate users and persons lawfully entitled to dispose of an ultimate user decedent's property will not be required to provide any personally identifiable information when using Standard Mail-Back Services to dispose of Unwanted Medicine. See DEA Rule § 1317.70(d). As required under DEA Rule § 1317.70(e), Vendor will only accept Standard Mail-Back Packages it made available (or packages lawfully forwarded under DEA requirements). Within three business days of receipt, Vendor will notify the DEA if it receives Standard Mail-Back Packages likely containing controlled substances that Vendor did not make available or did not agree to receive pursuant to DEA requirements. In accordance with DEA Rule § 1317.70(f),

when Standard Mail-Back Packages are received, only employees of Vendor will handle the Standard Mail-Back Packages. Standard Mail-Back Packages will not be opened, x-rayed, analyzed, or otherwise penetrated upon receipt by Vendor. *See* DEA Rule § 1317.70(f). Vendor will keep all records required under the DEA Rule, including those identified in DEA Rule § 1304.22(f).

See Appendix G for Standard Mail-Back Package image and package specifications.

2. Inhaler Mail-Back Services for Inhalers

For inhalers, MED-Project offers Inhaler Mail-Back Services at no cost to disabled and home-bound Residents, or persons providing services to such Residents, via the Call Center and MED-Project Website. The pre-paid shipping label directs the Inhaler Mail-Back Packages to an approved facility identified in Section X. An instruction sheet is included with the Inhaler Mail-Back Package that describes how to properly dispose of inhalers, explains what materials may be placed in the Inhaler Mail-Back Package, and how to return the Inhaler Mail-Back Package.

See Appendix G for an Inhaler Mail-Back Package image and package specifications.

3. Mail-Back Package Availability

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

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

4. Mail-Back Package Collection and Disposal

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

For Standard Mail-Back Packages, upon arriving at the disposal facility, the Mail-Back Packages are scanned for receipt verification and incinerated at the disposal facilities listed in Section X. Any storage of filled Standard Mail-Back Packages by Vendor complies with the applicable security requirements of DEA Rule § 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances. All Unwanted Medicine in Standard Mail-Back Packages are destroyed promptly.

VI. Goals

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

Goal Area	Short-Term Goals (12 to 18 months Post Approval)	Long-Term Goals (19 to 36 months Post Approval)	
Collection	MED-Project's goal is to achieve 100 Kiosk Drop-Off Sites, distributed jointly, in combination with other approved product stewardship programs, across the County to provide equitable and reasonably convenient access to Residents.	Accept any additional potential Kiosk Drop-Off Sites that are eligible and request participation in the Program. Reduce collection via Take-Back Events and/or Mail-Back Services by establishing additional Kiosk Drop-Off Sites throughout the County.	
Education & Public Outreach	Continue media Program consistent with Regulations § 8.A.viii via the following: • Website • Call Center • Media campaigns (for example, digital television, radio, and social media)	Continue media Program consistent with Regulations § 8.A.viii via the following: • Website • Call Center • Media campaigns (for example digital television, radio, and social media)	

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

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

VII. Patient Privacy

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

In addition to kiosk signage, MED-Project promotional and educational materials encourage Residents to protect their information by ensuring that identifiable information is not present before depositing containers into kiosks or Mail-Back Packages.

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

Vendor has additional protections available for keeping Residents' personally identifiable information safe and secure. Unwanted Medicine Service Technicians are trained in managing items containing sensitive patient information. Privacy training is part of an Unwanted Medicine Service Technician's prerequisite for field services. As an added protection, inner liners for the kiosks are opaque rather than clear, in compliance with DEA Rule.

VIII. Call Center

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

The Call Center provides information about:

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

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

A sample Call Center outline is included in Appendix I.

IX. Training

Vendor certifies training of Unwanted Medicine Service Technicians on the following:

- DOT HMR training to meet the requirements of 49 CFR Part 172.704(a).
- DEA controlled substances handling protocols.
- Emergency Spill Response and Contingency Plan
- Health Insurance Portability and Accountability Act (HIPAA) requirements.
- OSHA Blood Borne Pathogens Standards.
- Safety Training
- Security awareness Training
- Communication Devices
- PPE Utilization
- Alarm Systems
- General Awareness/Familiarization
- In-Depth Security Training (if applicable)
- Function Specific Training

At a Kiosk Drop-Off Site, operational procedures, including annual training, are the responsibility of the Kiosk Drop-Off Site Host. MED-Project provides a Help Desk to answer questions and monitor comments for participating Kiosk Drop-Off Sites.

X. Vendor, Transporter, and Disposal Facility Information

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

A. Vendors

Name	Address	Phone	Website	Туре	Penalty Record (5 years)
Covanta Environmental Solutions, LLC	190 Shellyland Road, Manheim, PA 17545	(717) 653- 8882	www.cova nta.com	Vendor	None
PureWay Compliance, Inc.	20501 Katy Freeway, Suite 206, Katy, TX 77450	(877) 765- 3030	www.pure way.com	Vendor	None
Stericycle, Inc.	2355 Waukegan Road, Bannockbu rn, IL 60015	(847) 367- 5910	www.steric ycle.com	Vendor	None

B. Reverse Distributors

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Covanta Environmental Solutions, LLC	2515 S Holt Rd, Indianapolis, IN 46241	(317) 719- 6397	https://ww w.covanta. com/Our- Facilities/C ES-Indy	DEA Registered Collector and Reverse Distributor	DEA Registratio n No: RC0561628	<i>See</i> Appendix H

⁴ Two witnesses of the registrant will witness destruction at the disposal facilities.

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Covanta Manheim, Pennsylvania Facility	190 Shellyland Road, Manheim, PA 17545	(717) 653- 8882	www.cova ntaes.com	DEA Registered Collector and Reverse Distributor	DEA Registratio n No: RC0322595	None
Stericycle, Inc. Warren, Ohio Facility	1901 Pine Avenue, SE, Warren, OH 44483	(330) 393- 0370	www.steric ycle.com/s ervice- locations/o hio/warren	DEA Registered Collector and Reverse Distributor	DEA Registratio n No: RS0498130	See Appendix H
Sedgwick Claims Management Services, Inc	2670 Executive Drive, Suite A, Indianapolis, IN 46241	317- 250- 4353	Sedgwick.c om	DEA Registered Reverse Distributor	DEA Registratio n No: RS0629874	See Appendix H

C. Carriers & Transporters

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Covanta Environment al Solutions dba Chesapeake Waste Solutions, LLC	190 Shellyland Road, Manheim, PA 17545	(336) 683-0809	www.cova ntaes.com	Carrier	PADEP Registration PA-HC0283	None

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Covanta Environment al Solutions Carriers II, LLC	5300 N 33rd St, Milwaukee, WI 53209	(336) 683-0809	www.cova ntaes.com	Hazardous Waste Transporter	DOT No: 508337	None
Doncin Transport, Inc.	3478 Sunnyside Rd, Manheim, PA 17545	(602) 344-4536	None provided	Contract Carrier	DOT No: 1625457	None
EMS Dispatch, Inc.	316 W Mt Vernon St, Lansdale, PA 19446	(717) 689-5129	https://w ww.facebo ok.com/pa ges/Ems- Dispatch/1 37953629 908858	Contract Carrier	DOT No: 000743959	None
Heritage Transport	1626 Research Way, Indianapoli s, IN 46231	(317) 486-2973	http://ww w.heritage = enviro.co m/	Hazardous Waste Transporter	DOT No: 314460	None
Stericycle Inc.	2850 100th Court NE, Blaine, MN 55449	(612) 285-9865	www.steri cycleenvir onmental. com	Hazardous Waste Transporter	DOT No: 1348411	None
Tri-State Motor Transit Co.	8141 E 7th St, Joplin, MO 64801	(877) 860-1600	https://tris tatesecure d.com/	Hazardous Waste Transporter	DOT No: 1007292	None

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
United Parcel Service, Inc.	55 Glenlake Parkway NE, Atlanta, GA 30328	(800) PICK-UPS	www.UPS. com/	Common Carrier	DOT No: 121058	Closed Case 9/18/201 9 VA- 2019- 0057- US1436
United States Postal Service	475 L'Enfant Plaza SW, Washington , DC 20260	(202) 268-2000	www.USP S.com/	Common Carrier	N/A	See USPS SEC filings

D. Disposal Facilities

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Clean Harbors Aragonite, LLC	11600 North Aptus Rd, Grantsville, UT 84029	(435) 884-8900	www.clea nharbors. com/locat ion/arago nite- incinerati on-facility	Hazardous Waste Incinerator	EPA ID No: UTD98155217 7 Title V Operating Permit No: 4500048003	See Appendix H
Curtis Bay Energy, LP	3200 Hawkins Point Road, Baltimore, MD 21226	(855) 228-1715	www.curti sbaymws. com	Medical Waste Incinerator	EPA ID No: MDD98540431 8 Refuse Disposal Permit No: 2017-WMI- 0036	See Appendix H

Name	Address	Phone	Website	Туре	Issued Permits	Penalty Record (5 years)
Heritage Thermal Services – Ohio	1250 Saint George Street, East Liverpool, OH 43920	(800) 545-7655	http://ww w.heritag e- thermal.c om/	Hazardous Waste Incinerator	EPA ID No: OHD98061354 1 Title V Operating Permit No: OH000000021 5020233	<i>See</i> Appendix H
Ross Incineration Services, Inc.	36790 Giles Road, Grafton, OH 44044	(440)- 748-5800	http://ww w.rossenv ironmenta l.com/	Hazardous Waste Incinerator	EPA ID No: OHD04841566 5 Title V Operating Permit No: OH00000024 7050278	<i>See</i> Appendix H
Stericycle, Inc., Warren, Ohio Facility	1901 Pine Avenue SE, Warren, OH 44483	(330) 393-0370	https://w ww.steric ycle.com/ service- locations/ ohio/warr en	Medical Waste Incinerator	EPA ID No: OHD98079528 0 Title V Operating Permit No: OH000000027 8080634	<i>See</i> Appendix H
Veolia – Port Arthur	7665 Highway 73, Beaumont, TX 77705	(409) 736-2821	www.veol ianortham erica.com	Hazardous Waste Incinerator	EPA ID No: TXR00003625 1 Title V Operating Permit No: TX0000004824 500118	<i>See</i> Appendix H

XI. Unwanted Medicine Educational and Outreach Programming

A. Overview

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

B. Audiences

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

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

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

Survey results will be utilized in order to inform improvements to the design of the outreach program and educational materials where necessary (see Section XI.F).

C. Messages

MED-Project anticipates that messaging will:

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

Key points of emphasis might include:

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

D. Tools/Communications Channels

The MED-Project Program will include a number of components designed to reach consumers and provide consistent access to timely and relevant information. Distribution of materials will likely include audiences

such as LEAs, retail pharmacies, health care providers and systems, health associations, local government agencies, and other community organizations.

MED-Project will design and execute a measurable public education and outreach strategy aimed at driving awareness of take-back of Unwanted Medicine and in line with Ordinance §§ 6.53.050 (A) (8) and 6.53.070. MED-Project will evaluate and Plan media tactics based on the needs of the campaign and media usage within the target audience, and these may include a combination of digital media campaigns, print ads, out-of-home ads, digital video, and traditional broadcast media based on budget. The quantity and frequency will be confirmed as activities are completed.

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

1. Phone

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

- Call Center in the Specified Languages. The telephone line will also provide an option for callers
 to be transferred to a staffed Call Center. Live operators will be available in English and Spanish.
 If a caller requires assistance in Chinese, Vietnamese or Tagalog, an operator will be available to
 provide additional assistance. Operators providing services in over 200 languages are available 24
 hours a day, seven days a week.
- Basic information about the Program, such as where to obtain more information (e.g., the MED-Project Website) and an option to talk with an agent to find or utilize Kiosk Drop-Off Sites, Mail-Back Services, and/or Take-Back Events, if applicable, in the caller's zip code or local area.
- A recorded call script directing callers with medical emergencies to call 911 and directing callers with medication-related questions to contact their health care provider(s).

Please see Appendix I for the Call Center IVR flow.

2. MED-Project Website

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

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

3. Materials

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

The Plan includes the information and educational brochure (<u>Appendix K</u>). Educational materials will use plain language and explanatory images to promote consumer education and collection options to Residents with limited English proficiency.

4. Social Media

MED-Project has established social media accounts to communicate outreach information. Outreach is based on the establishment of Kiosk Drop-Off Sites, Mail-Back Services, and the scheduling of Take-Back Events. Posts will be utilized as needed to reflect the most up-to-date information.

5. Broadcast Outreach

Outreach through local print, online, radio, and television outlets, including through outlets specifically targeting the diverse demographic communities within the County, will continue upon Plan approval. Please *see* Appendix F for a media list of key outlets. Broadcast outreach will be scheduled to reflect the learnings and needs of the campaign based on the biennial survey outcomes and budget.

E. Collaboration with County Officials and Community Organizations

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

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

F. Effectiveness

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

G. Disclaimer

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

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

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

H. DEA Controlled Substances Act and Implementing Regulations

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

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

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

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

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

Controlled substances collected pursuant to the Plan may be commingled with non-controlled substances at Kiosk Drop-Off Sites, Take-Back Events, and through Mail-Back Services per the DEA Rule. *See* DEA

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

Rule §§ 1317.75(b) (Kiosk Drop-Off Sites); 1317.65(d) (Take-Back Events); 1317.70(b) (Mail-Back Services).

1. DEA Registration Modification

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

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

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

I. United States Department of Transportation (DOT)

When transporting Unwanted Medicine, Vendor will ensure compliance with the U.S. DOT HMR and other applicable DOT requirements.

J. California Board of Pharmacy

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

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

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

XIII. Annual Report

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

Appendix A

MED-Project Participants

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

Appendix B

Contact List for Outreach and Education to the Community

The following is a representative list of Associations, Agencies, and Organizations that may be contacted for assistance with outreach and education to the community.

Health Systems:

Alameda County Medical Center Children's Hospital and Research Center Fremont Hospital Kaiser Foundation Hospital St. Rose Hospital Sutter Health Stanford Health Washington Hospital

Health Associations and Societies:

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

Organizations, Districts, and Agencies:

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

Appendix C

Interested Sites and Participating Kiosk Drop-Off Sites as of June 29, 2022

MED-Project will provide the County with a list of participating Kiosk Drop-Off Sites on a periodic basis, as requested by the County. Kiosk Drop-Off Sites marked with an asterisk have received an exception from Alameda County Department of Environment Health to operate as an On-Demand Collection Service Kiosk Drop-Off Site.

Site Name	Address	City	Zip Code	Status
ACCESS PHARMACY	2693 FRUITVALE AVENUE	OAKLAND	94601	ACTIVE SITE*
ALAMEDA COUNTY SHERIFF'S OFFICE	15001 FOOTHILL BLVD.	SAN LEANDRO	94578	INTERESTED
ALAMEDA HOSPITAL	2070 CLINTON AVENUE	ALAMEDA	94501	ACTIVE SITE
ALAMEDA POLICE DEPARTMENT	1555 OAK ST.	ALAMEDA	94501	ACTIVE SITE*
BART POLICE DEPARTMENT	101 8TH ST.	OAKLAND	94607	ACTIVE SITE
BERKELEY POLICE DEPARTMENT (1st kiosk)	2100 MARTIN LUTHER KING JR. WAY	BERKELEY	94704	ACTIVE SITE
BERKELEY POLICE DEPARTMENT (2 nd kiosk)	2100 MARTIN LUTHER KING JR. WAY	BERKELEY	94704	ACTIVE SITE
California State University, East Bay	25800 Carlos Bee Boulevard	Hayward	94542	ACTIVE SITE*
PANSMART, INC.	2557 MOWRY AVE.	FREMONT	94538	ACTIVE SITE
CLOVER PHARMACY	6170 THORNTON AVE.	NEWARK	94560	ACTIVE SITE*
CVS/PHARMACY #0331	2000 DRISCOLL RD.	FREMONT	94539	ACTIVE SITE*
CVS/PHARMACY #0816	22501 FOOTHILL BLVD.	HAYWARD	94541	ACTIVE SITE*
CVS/PHARMACY #09397	4405 1ST ST.	LIVERMORE	94551	ACTIVE SITE*

Site Name	Address	City	Zip Code	Status
CVS/PHARMACY #09494	35080 NEWARK BLVD.	NEWARK	94560	ACTIVE SITE*
CVS/PHARMACY #09553	4349 SAN PABLO AVENUE	EMERYVILLE	94608	ACTIVE SITE*
CVS/PHARMACY #09600	35720 FREMONT BLVD.	FREMONT	94536	ACTIVE SITE*
CVS/PHARMACY #09622	243 W JACKSON ST.	HAYWARD	94544	ACTIVE SITE*
CVS/PHARMACY #09635	1550 E 14TH STREET	SAN LEANDRO	94577	ACTIVE SITE*
CVS/PHARMACY #09678	1500 1ST ST.	LIVERMORE	94550	ACTIVE SITE*
CVS/PHARMACY #09876	699 LEWELLING BLVD.	SAN LEANDRO	94579	ACTIVE SITE*
CVS/PHARMACY #09904	3667 CASTRO VALLEY BLVD.	CASTRO VALLEY	94546	ACTIVE SITE*
CVS/PHARMACY #09941	1451 SHATTUCK AVE.	BERKELEY	94709	ACTIVE SITE*
CVS/PHARMACY #09942	1401 WASHINGTON AVE.	SAN LEANDRO	94577	ACTIVE SITE*
CVS/PHARMACY #10119	6750 BERNAL AVE.	PLEASANTON	94566	ACTIVE SITE*
CVS/PHARMACY #10121	2655 TELEGRAPH AVE.	BERKELEY	94704	ACTIVE SITE*
CVS/PHARMACY #10199	26059 MISSION BLVD.	HAYWARD	94544	ACTIVE SITE *
CVS/PHARMACY #10475	2964 BROADWAY	OAKLAND	94611	ACTIVE SITE*
CVS/PHARMACY #10924	3010 BERNAL AVE.	PLEASANTON	94566	ACTIVE SITE*

Site Name	Address	City	Zip Code	Status
CVS/PHARMACY #3024	7201 REGIONAL ST.	DUBLIN	94568	ACTIVE SITE*
CVS/PHARMACY #3026	2300 SHATTUCK AVE.	BERKELEY	94704	ACTIVE SITE*
CVS/PHARMACY #8431	7200 BANCROFT AVE.	OAKLAND	94605	ACTIVE SITE*
CVS/PHARMACY #9099	4020 FREMONT HUB	FREMONT	94538	ACTIVE SITE*
CVS/PHARMACY #9128	2314 SANTA CLARA AVE.	ALAMEDA	94501	ACTIVE SITE*
CVS/PHARMACY #9130	175 41ST ST.	OAKLAND	94611	ACTIVE SITE*
CVS/PHARMACY #9226	3320 FRUITVALE AVE.	OAKLAND	94602	ACTIVE SITE*
CVS/PHARMACY #9234	46445 MISSION BLVD.	FREMONT	94539	ACTIVE SITE*
CVS/PHARMACY #9250	885 ISLAND DR. STE. A	ALAMEDA	94502	ACTIVE SITE*
CVS/PHARMACY #9251	3999 SANTA RITA ROAD	PLEASANTON	94588	ACTIVE SITE *
CVS/PHARMACY #9255	931 MARINA VILLAGE PKWY	ALAMEDA	94501	ACTIVE SITE *
CVS/PHARMACY #9378	4100 REDWOOD RD.	OAKLAND	94619	ACTIVE SITE *
DUBLIN POLICE SERVICES	100 CIVIC PLAZA	DUBLIN	94568	ACTIVE SITE
Dublin Police Services	6361 Clark Avenue	DUBLIN	94568	ACTIVE SITE*
SUTTER HEALTH EDEN MEDICAL CENTER (1ST KIOSK)	20103 LAKE CHABOT ROAD	CASTRO VALLEY	94546	ACTIVE SITE
EDEN HOSPITAL (2ND KIOSK)	20103 LAKE CHABOT ROAD	CASTRO VALLEY	94546	ACTIVE SITE
EMERYVILLE POLICE DEPARTMENT	2449 POWELL ST.	EMERYVILLE	94608	ACTIVE SITE*
HALLER'S PHARMACY AND MEDICAL SUPPLY	37323 FREMONT BLVD.	FREMONT	94536	ACTIVE SITE *
HIGHLAND HOSPITAL OUTPATIENT	1411 E 31ST ST.	OAKLAND	94602	ACTIVE SITE

Site Name	Address	City	Zip Code	Status
PHARMACY (1ST KIOSK)				
JADE PHARMACY	34460 FREMONT BLVD., SUITE B	FREMONT	94555	ACTIVE SITE
KAISER HEALTH PLAN OHLONE PHY 162 (1st kiosk)	39400 PASEO PADRE PKWAY	FREMONT	94538	ACTIVE SITE*
KAISER HEALTH PLAN OHLONE PHY 162 (2 nd kiosk)	39400 PASEO PADRE PKWAY	FREMONT	94538	ACTIVE SITE*
KAISER DUBLIN MOB PHARMACY 061	3100 DUBLIN BLVD., FL. 1	DUBLIN	94568	ACTIVE SITE*
KAISER HEALTH PLAN SOUTH 1 PHY 471	7601 STONERIDGE	PLEASANTON	94588	ACTIVE SITE*
KAISER PERMANENTE PHARMACY #102	3701 BROADWAY	OAKLAND	94611	ACTIVE SITE*
KAISER PERMANENTE PHARMACY #105	3600 BROADWAY	OAKLAND	94611	ACTIVE SITE *
KAISER PERMANENTE PHARMACY #241			94551	ACTIVE SITE
KAISER PERMANENTE PHARMACY NO 101	2417 CENTRAL AVE.	ALAMEDA	94501	ACTIVE SITE*
KAISER UNION CITY MAIN MOB 2 PHY #132 (1st kiosk)	3553 WHIPPLE RD.	UNION CITY	94587	ACTIVE SITE*
KAISER UNION CITY MAIN MOB 2 PHY #132 (2 nd kiosk)	3553 WHIPPLE RD.	UNION CITY	94587	ACTIVE SITE*
KAISER PERMANENTE PHARMACY #923 (1 st kiosk)	2500 MERCED ST., BLDG H, FL 1, ROOM 1436	SAN LEANDRO	94577	ACTIVE SITE*

Site Name	Address	City	Zip Code	Status
KAISER PERMANENTE PHARMACY #923 (2 nd kiosk)	2500 MERCED ST., BLDG H, FL 1, ROOM 1436	SAN LEANDRO	94577	ACTIVE SITE*
Kaiser Berkeley #910 OP Pharmacy	2621 Tenth Street, FL 2 Room 2505	Berkeley	94710	ACTIVE SITE*
MISSION PHARMACY	22138 MISSION BLVD.	HAYWARD	94541	ACTIVE SITE
MOWRY MEDICAL PHARMACY	1999 MOWRY AVE., STE A	FREMONT	94538	ACTIVE SITE*
NEW OAKLAND PHARMACY - LAKE MERRITT	250 E. 18TH ST.	OAKLAND	94606	ACTIVE SITE
NEW OAKLAND PHARMACY #2	388 9TH ST.	OAKLAND	94607	ACTIVE SITE
NEW OAKLAND PHARMACY #1	333 9TH ST.	OAKLAND	94607	ACTIVE SITE
PIEDMONT POLICE DEPARTMENT	403 HIGHLAND AVE.	PIEDMONT	94611	ACTIVE SITE
PLEASANTON / BART POLICE SERVICES CENTER	6050 STONERIDGE MALL ROAD	PLEASANTON	94588	ACTIVE SITE
PLEASANTON POLICE DEPARTMENT	4833 BERNAL AVE.	PLEASANTON	94566	ACTIVE SITE
RITE AID 05918	3744 MOWRY AVENUE	FREMONT	94538	INTERESTED
RITE AID 05920	31091 MISSION BOULEVARD	HAYWARD	94544	ACTIVE SITE*
RITE AID 05922	3848 CASTRO VALLEY BOULEVARD	CASTRO VALLEY	94546	ACTIVE SITE*
RITE AID 05925	968 MURRIETA BOULEVARD	LIVERMORE	94550	ACTIVE SITE*
RITE AID 05937	1355 MACARTHUR BOULEVARD	SAN LEANDRO	94577	ACTIVE SITE*

Site Name	Address	City	Zip Code	Status
RITE AID 05942	31836 ALVARADO BOULEVARD	UNION CITY	94587	ACTIVE SITE*
RITE AID 05943	1650 DECOTO ROAD	UNION CITY	94587	ACTIVE SITE*
RITE AID 05944	2819 HOPYARD ROAD	PLEASANTON	94588	ACTIVE SITE*
RITE AID 05952	1991 MOUNTAIN BOULEVARD	OAKLAND	94611	ACTIVE SITE*
RITE AID 06456	1350 NORTH VASCO ROAD	LIVERMORE	94551	ACTIVE SITE*
SAN LEANDRO HOSPITAL	13855 EAST 14TH ST.	SAN LEANDRO	94578	ACTIVE SITE
TEDS DRUGS	27453 HESPERIAN	HAYWARD	94545	ACTIVE SITE*
TENNYSON PHARMACY	589 W. TENNYSON	HAYWARD	94544	ACTIVE SITE*
UNITED PHARMACY	2929 TELEGRAPH AVE.	BERKELEY	94705	ACTIVE SITE
WASHINGTON HOSPITAL PHARMACY	2000 MOWRY AVE.	FREMONT	94538	ACTIVE SITE
WELLSPRING PHARMACY	4184 C PIEDMONT AVE.	OAKLAND	94611	ACTIVE SITE*

Appendix D

Potential Additional Kiosk Drop-Off Sites

Site Name	Address	City	Zip
AHF PHARMACY	400 THIRTIETH ST. STE 300	OAKLAND	94609
AIRPORT POLICE SERVICES	8980 EARHART RD.	OAKLAND	94621
ALAMEDA PHARMACY LLC	1555 DOOLITTLE DRIVE #160	SAN LEANDRO	94577
ALBANY POLICE DEPARMTNET	1000 SAN PABLO AVE.	ALBANY	94706
ALTA BATES SUMMIT MED CTR- HERRICK CAMPUS	2001 DWIGHT WY.	BERKELEY	94704
ALTA BATES SUMMIT MEDICAL CENTER - ALTA BATES CAMPUS	2450 ASHBY AVE.	BERKELEY	94705
ALTA BATES SUMMIT MEDICAL CENTER - SUMMIT CAMPUS	350 HAWTHORNE AVE.	OAKLAND	94609
ALTA BATE@S SUMMIT OUTPATIENT PHARMACY	2001 DWIGHT WAY STE. 2182	BERKELEY	94704
BART POLICE DEPARTMENT	800 MADISON ST.	OAKLAND	94607
BRADFORD PHARMACY INC.	445 8TH STREET	OAKLAND	94607
CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL	700 HEINZ AVE., #200	BERKELEY	94710
CALIFORNIA STATE UNIVERSITY, EAST BAY	25800 CARLOS BEE BLVD.	HAYWARD	94542
CENTRAL ADMIXTURE PHARMACY SERVICES INC	48006 FREMONT BLVD.	FREMONT	94538
CHILDREN'S HOSPITAL & RESEARCH CENTER AT OAKLAND	747 52ND ST.	OAKLAND	94609
CHILDREN'S HSP MED CTR AMBULATORY CARE	744 52ND ST.	OAKLAND	94609
CHILDRENS CLINIC PHARMACY	747 52ND STREET	OAKLAND	94609
CLEAR CHOICE PHARMACY	3059 HOPYARD RD. STE. C	PLEASANTON	94588
COMMUNITY A WALGREENS PHARMACY #16477	3009 BROADWAY	OAKLAND	94611

CORAM CVS/SPECIALTY INFUSION SERVICES	3160 CORPORATE PLACE	HAYWARD	94545
COSTCO PHARMACY #1061	28505 HESPERIAN BLVD.	HAYWARD	94545
COSTCO PHARMACY #146	2800 INDEPENDENCE DRIVE	LIVERMORE	94550
COSTCO PHARMACY #778	43621 PACIFIC COMMONS BLVD.	FREMONT	94538
COSTCO PHARMACY 118	1900 DAVIS STREET	SAN LEANDRO	94577
CPP PET CARE	3157 CORPORATE PL.	HAYWARD	94545
CRESCENT HEALTHCARE	2547 BARRINGTON CT.	HAYWARD	94545
CVS/PHARMACY # 16116	7200 AMADOR PLAZA RD.	DUBLIN	94568
CVS/PHARMACY # 16275	4300 LAS POSITAS RD.	LIVERMORE	94551
CVS/PHARMACY # 16764	15555 E 14TH ST STE 400	SAN LEANDRO	94578
CVS/PHARMACY # 16804	2499 WHIPPLE RD.	HAYWARD	94544
CVS/PHARMACY # 17044	1057 ESTSHORE HWY.	ALBANY	94710
CVS/PHARMACY # 17265	19661 HESPERIAN BLVD	HAYWARD	94541
CVS/PHARMACY # 17592	43950 PACIFIC COMMONS BLVD	FREMONT	94538
CVS/PHARMACY # 17624	1555 40TH STREET	EMERYVILLE	94608
CVS/PHARMACY # 17628	2800 DUBLIN BLVD	DUBLIN	94568
CVS/PHARMACY # 17657	2700 5TH ST.	ALAMEDA	94501
CVS/PHARMACY # 17673	2187 SHATTUCK AVE.	BERKELEY	94704
CVS/PHARMACY # 17781	2650 BROADWAY	OAKLAND	94612
CVS/PHARMACY # 09595	1382 SOLANO AVE.	ALBANY	94710
CVS/PHARMACY # 09929	2000 MOUNTAIN BLVD.	OAKLAND	94611
DAYSMAN PHARMACY LLC	3760 MOWRY AVE.	FREMONT	94538
DELIVERCARERX PHARMACY LLC	3095 INDEPENDENCE DR., STE A	LIVERMORE	94551

EAST BAY AIDS CENTER OUTPATIENT PHARMACY	3100 SUMMIT ST.	OAKLAND	94609
EAST BAY REGIONAL PARK POLICE	17930 LAKE CHABOT ROAD	CASTRO VALLEY	94546
EAST OAKLAND HEALTH PHARMACY	7450 INTERNATIONAL BLVD.	OAKLAND	94621
ENTIRELYPETS PHARMACY	34571 SEVENTH ST.	UNION CITY	94587
FAIRMONT HOSPITAL PHARMACY	15400 FOOTHILL BOULEVARD	SAN LEANDRO	94578
FOODMAXX PHARMACY #484	3100 EAST 9TH ST.	OAKLAND	94601
FREMONT HOSPITAL PHARMACY	15400 FOOTHILL BLVD.	SAN LEANDRO	94578
FREMONT HOSPITAL	39001 SUNDALE DR.	FREMONT	94538
FREMONT POLICE DEPARTMENT	2000 STEVENSON BLVD.	FREMONT	94538
GARFIELD BEACH CVS LLC D/B/A CVS/PHARMACY # 17712	1414 UNIVERSITY AVE.	BERKELEY	94702
HALLER'S LTC PHARMACY	4067 PERALTA BLVD.	FREMONT	94536
HAYWARD POLICE DEPARTMENT	300 WEST WINTON AVE.	HAYWARD	94544
HAYWARD SISTERS HOSPITAL DBA ST ROSE HOSPITAL	27200 CALAROGA AVE. RM A1- 108	HAYWARD	94545
HERRICK CAMPUS PHARMACY	2100 DWIGHT WAY RM 2113	BERKELEY	94704
HIGHLAND HOSPITAL POLICE SERVICES	1411 E 31 ST ST.	OAKLAND	94606
HIGH STREET PHARMACY	4248 MACARTHUR BLVD.	OAKLAND	94619
INTEGRATED MEDICAL ASSOCIATES PHARMACY INC	10500 MACARTHUR BLVD. #103	OAKLAND	94605
JOHN GEORGE PSYCHIATRIC PAVILION PHY	2060 FAIRMONT DRIVE	SAN LEANDRO	94578
KABAFUSION LLC	5860 W LAS POSITAS BLVD. #19	PLEASANTON	94588
KAISER FDN HSP INP PHY 16A	39400 PASEO PADRE PARKWAY	FREMONT	94538

KAISER FDN HLT PLAN FABIOLA 1 PHY 115	3801 HOWE ST.	OAKLAND	94511
KAISER FOUNDATION CPP PHARMACY 251	300 G PULLMAN STREET	LIVERMORE	94550
KAISER FOUNDATION HOSPITAL PHARMACY #10A	275 W MACARTHUR BLVD.	OAKLAND	94611
KAISER FOUNDATION HOSPITAL PHARMACY #92A	2500 MERCED ST HOSPITAL BLDG	SAN LEANDRO	94577
KAISER FOUNDATION HOSPITAL PHY #47B	7601 STONERIDGE DR. RM 218	PLEASANTON	94588
KAISER HEALTH PLAN NILES 3 PHY 164	39400 PASEO PADRE PARKWAY	FREMONT	94538
KAISER HEALTH PLAN NILES PHY 161	39400 PASEO PADRE PARKWAY	FREMONT	94538
KAISER PERMANENTE ONCOLOGY PHARMACY #168	39400 PASEO PADRE PKWY., NILES BLDG FL 2, RM. 7210	FREMONT	94538
KAISER HEALTH PLAN NORTH 1 PHY 473	5600 STONERIDGE MALL ROAD	PLEASANTON	94588
KAISER HLTH PLAN SLEEPY HOLLOW PHY 143	27303 SLEEPY HOLLOW AVENUE SOUTH	HAYWARD	94545
KAISER ONCOLOGY PHARMACY #104	3701 BROADWAY FLR 3	OAKLAND	94611
KAISER ONCOLOGY PHARMACY #165	39400 PASEO PADRE PKWY NILES BLDG 2 ND . FL	FREMONT	94538
KAISER PERMANENTE PHARMACY #181	1795 SECOND ST., SUITE B	BERKELEY	94710
KAISER PERMANENTE PHARMACY #470	7601 STONEBRIDGE DR., FL. 2, RM. 2104	PLEASANTON	94588
KAISER PERMANENTE PHARMACY #921	2500 MERCED ST. FL 1	SAN LEANDRO	94577
KAISER PERMANENTE PHARMACY #922	2500 MERCED ST. 2ND FL RM 2966	SAN LEANDRO	94577
KINDRED HSP-SAN FRANCISCO BAY	2800 BENEDICT DR.	SAN LEANDRO	94577
LA CLINICA DE LA RAZA	3451 E 12TH ST.	OAKLAND	94601
LA CLINICA DE LA RAZA, INC.	1030 INTERNATIONAL BLVD.	OAKLAND	94606
LIFESCRIPT PHARMACY	7700 EDGEWATER DR. #220	OAKLAND	94621

LIVERMORE POLICE DEPARTMENT	1110 SOUTH LIVERMORE AVE.	LIVERMORE	94550
LUCKY PHARMACY #711	40055 MISSION BLVD.	FREMONT	94539
LUCKY PHARMACY #712	34101 FREMONT BLVD.	FREMONT	94555
LUCKY PHARMACY #714	5000 MOWRY AVE.	FREMONT	94538
LUCKY PHARMACY #715	22555 MISSION BLVD.	HAYWARD	94541
LUCKY PHARMACY #716	25151 SANTA CLARA ST.	HAYWARD	94544
LUCKY PHARMACY #721	2000 PORTOLA AVE.	LIVERMORE	94550
LUCKY PHARMACY #722	1951 HOLMES ST.	LIVERMORE	94550
LUCKY PHARMACY #736	247 E 18TH ST.	OAKLAND	94606
LUCKY PHARMACY #744	6155 W LAS POSITAS BLVD.	PLEASANTON	94588
LUCKY PHARMACY #767	1300 FAIRMONT DR.	SAN LEANDRO	94578
LUCKY PHARMACY #768	15840 HESPERIAN BLVD.	SAN LORENZO	94580
LUCKY PHARMACY #782	32300 DYER ST.	UNION CITY	94587
MASONIC HOME PHARMACY	34400 MISSION BLVD.	UNION CITY	94587
MAXOR CORRECTIONAL PHARMACY SERVICES	C/O SANTA RITA JAIL	DUBLIN	94568
MEDICAL ARTS PHARMACY	13847 E 14TH ST., STE. 103	SAN LEANDRO	94578
MED-PLUS PHARMACY INC.	335 LINDBERGH AVE.	LIVERMORE	94551
MIDTOWN PHARMACY PROFESSIONAL CORPORATION	2173 HARBOR BAY PARKWAY	ALAMEDA	94502
MOWRY PLAZA PHARMACY	668 MOWRY AVE.	FREMONT	94536
NEWARK POLICE DEPARTMENT	37101 NEWARK BLVD.	NEWARK	94560
NEW CHINA TOWN PHARMACY	719 EAST 12TH STREET	OAKLAND	94606
NEW TIBURCIO VASQUEZ HEALTH CENTER PHY	33255 9TH STREET	UNION CITY	94587
NICHOLS HILL PRESCRIPTION PHARMACY	2844 SUMMIT STREET	OAKLAND	94609

NOWRX INC	29233 PACIFIC STREET	HAYWARD	94544
NOWRX INC	7067 COMMERCE CIRCLE	PLEASANTON	94588
OAKLAND CLINIC PHARMACY	5220 CLAREMONT AVE.	OAKLAND	94618
OAKLAND CITY HOUSING AUTHORITY POLICE DEPARTMENT	1540 WEBSTER ST.	OAKLAND	94612
OAKLAND POLICE DEPARTMENT	455 7 TH STREET	OAKLAND	94607
OAKLAND UNIFIED SCHOOL DISTRICT POLICE DEPARTMENT	1000 BROADWAY, SUITE 680	OAKLAND	94607
OHLONE COMMUNITY COLLEGE DISTRICT POLICE DEPARTMENT	43600 MISSION BLVD., BLDG 20	FREMONT	94539
OMNICARE OF HAYWARD	20967 CABOT BLVD.	HAYWARD	94545
ONEPOINT PATIENT CARE	1599 FACTOR AVE. STE. B	SAN LEANDRO	94577
PACIFIC PHARMACY	650 INTERNATIONAL BLVD.	OAKLAND	94606
PERALTA OUTPATIENT PHARMACY	3300 WEBSTER ST., GROUND FL	OAKLAND	94609
PETNET PHARMACEUTICAL	26563 CORPORATE AVE., STE 102	HAYWARD	94545
PHARMACA INTEGRATIVE PHARMACY INC	5729 COLLEGE AVE.	OAKLAND	94618
PHARMACA INTEGRATIVE PHARMACY INC	1744 SOLANO AVE.	BERKELEY	94707
PHARMERICA	32980 ALVARADO NILES RD. STE 836	UNION CITY	94587
PLEASANT CARE PHARMACY	1652 B ST.	HAYWARD	94541
RALEYS PHARMACY #316	5420 SUNOL BLVD.	PLEASANTON	94566
SAFEWAY PHARMACY #0676	1500 SOLANO AVE.	ALBANY	94706
SAFEWAY PHARMACY #0691	1444 SHATTUCK PLACE	BERKELEY	94709
SAFEWAY PHARMACY #0768	20629 REDWOOD RD.	CASTRO VALLEY	94546
SAFEWAY PHARMACY #0908	3550 FRUITVALE AVE.	OAKLAND	94602

SAFEWAY PHARMACY #0951	867 ISLAND DR.	ALAMEDA	94502
SAFEWAY PHARMACY #0971	22280 FOOTHILLS BLVD.	HAYWARD	94541
SAFEWAY PHARMACY #0993	3902 WASHINGTON BLVD.	FREMONT	94538
SAFEWAY PHARMACY #1197	1790 DECOTO RD.	UNION CITY	94587
SAFEWAY PHARMACY #1257	4495 FIRST ST.	LIVERMORE	94551
SAFEWAY PHARMACY #1931	46848 MISSION BLVD.	FREMONT	94539
SAFEWAY PHARMACY #1932	4440 TASSAJARA RD.	DUBLIN	94568
SAFEWAY PHARMACY #1953	7499 DUBLIN BLVD.	DUBLIN	94568
SAFEWAY PHARMACY #2708	2227 S SHORE CENTER	ALAMEDA	94501
SAFEWAY PHARMACY #2856	6790 BERNAL AVE.	PLEASANTON	94566
SAFEWAY PHARMACY #2870	6310 COLLEGE AVE.	OAKLAND	94618
SAFEWAY PHARMACY #3125	3889 SAN PABLO AVE.	EMERYVILLE	94608
SAFEWAY PHARMACY #3132	5100 BROADWAY	OAKLAND	94611
SAFEWAY PHARMACY #3281	2600 5TH ST.	ALAMEDA	94501
SAN LENADRO POLICE DEPARTMENT	835 EAST 14 [™] ST.	SAN LEANDRO	94577
SAVE MART SUPERMARKETS #73	105 W HANFORD-ARMONA RD	LIVERMORE	93245
SKILLED NURSING PHARMACY	21150 CABOT BLVD.	HAYWARD	94545
SOLEO HEALTH INC	1324 W WINTON AVE.	HAYWARD	94545
STANFORD EMERYVILLE HEALTH CENTER PHARMACY	5800 HOLLIS ST., RM 2325	EMERYVILLE	94608
SUTTER INFUSION & PHARMACY SERVICES	1105 ATLANTIC AVE. STE 102	ALAMEDA	94501
THE MEDICINE SHOPPE	5860 OWENS DRIVE, STE. 130	PLEASANTON	94588
TIB PHARMACY LLC	5886 MOWRY SCHOOL RD.	NEWARK	94560

TRUEPILL	3121 DIABLO AVE.	HAYWARD	94545
UC BERKELEY POLICE DEPARTMENT	1 SPROUL HALL (BASEMENT)	BERKELEY	94720
UNION CITY POLICE DEPARTMENT	34009 ALVARADO NILES RD.	UNION CITY	94587
UNIVERSAL COMPOUNDING PHARMACY	26046 EDEN LANDING RD., STE. 5	HAYWARD	94545
UNIVERSITY HEALTH SERVICE PHARMACY	2222 BANCROFT AVE RM. 1115	BERKELEY	94702
VALLEY MEMORIAL HOSPITAL PHARMACY	1111 EAST STANLEY BOULEVARD	LIVERMORE	94550
VALLEYCARE MEDICAL CENTER PHARMACY	5555 W LAS POSITAS BLVD. 1ST FL	PLEASANTON	94588
VALOR COMPOUNDING PHARMACY	2461 SHATTUCK AVENUE	BERKELEY	94720
VERSAILLES PHARMACY	2801 ENCINAL	ALAMEDA	94501
VIBRANT CARE PHARMACY INC	7400 MACARTHUR BLVD STE. B	OAKLAND	94605
WAL MART PHARMACY 10 2031	30600 DYER STREET	UNION CITY	94587
WAL-MART PHARMACY 10-1972	2700 LAS POSITAS RD.	LIVERMORE	94551
WAL-MART PHARMACY 10-5434	15555 HESPERIAN BLVD.	SAN LEANDRO	94579
WAL-MART PHARMACY 10-5611	3112 SANTA RITA RD.	PLEASANTON	94566
WALGREEN CO D/B/A WALGREENS #15330	5809 FOOTHILL BLVD.	OAKLAND	94605
WALGREENS #00101	3382 CASTRO VALLEY BLVD.	CASTRO VALLEY	94546
WALGREENS #01536	3434 HIGH STREET	OAKLAND	94619
WALGREENS #01537	3232 FOOTHILL BLVD.	OAKLAND	94601
WALGREENS #01625	5055 TELEGRAPH AVE.	OAKLAND	94609
WALGREENS #02150	1763 SANTA RITA RD.	PLEASANTON	94566
WALGREENS #02306	1138 W TENNYSON_RD.	HAYWARD	94544
WALGREENS #02314	1050 GILMAN ST.	BERKELEY	94710

WALGREENS #02366	3860 DECOTO ROAD	FREMONT	94555
WALGREENS #02401	21463 FOOTHILL BLVD.	HAYWARD	94541
WALGREENS #02426	15500 WASHINGTON AVE.	SAN LEANDRO	94579
WALGREENS #02609	2995 SAN PABLO AVE.	BERKELEY	94702
WALGREENS #02660	41400 BLACOW RD.	FREMONT	94538
WALGREENS #03170	3400 TELEGRAPH AVE.	OAKLAND	94609
WALGREENS #04050	1916 WEBSTER ST.	ALAMEDA	94501
WALGREENS #04517	2600 MOWRY AVE.	FREMONT	94538
WALGREENS #04614	2801 ADELINE ST.	BERKELEY	94703
WALGREENS #04659	164 W JACKSON ST.	HAYWARD	94544
WALGREENS #06502	23958 HESPERIAN BLVD.	HAYWARD	94541
WALGREENS #07274	1456 136TH AVE.	SAN LEANDRO	94578
WALGREENS #09248	2300 OTIS DRIVE	ALAMEDA	94501
WALGREENS #10045	2310 TELEGRAPH AVE.	BERKELEY	94704
WALGREENS #10526	3250 LAKESHORE AVE. SUITE B	OAKLAND	94610
WALGREENS #11706	301 EAST 18TH STREET	OAKLAND	94606
WALGREENS #13595	1333 BROADWAY	OAKLAND	94612
WALGREENS #15025	2190 SHATTUCK AVE.	BERKELEY	94704
WALGREENS #15163	1620 FIRST STREET	LIVERMORE	94550
WALMART PHARMACY #10-2989	44009 OSGOOD RD.	FREMONT	94539
WALMART PHARMACY #10-5426	40580 ALBRAE ST.	FREMONT	94538
WALMART PHARMACY 10 2161	4501 ROSEWOOD DRIVE	PLEASANTON	94588
WALMART PHARMACY NO 10 2648	1919 DAVIS STREET	SAN LEANDRO	94577
	•		

WEST OAKLAND HEALTH CENTER	700 ADELINE ST.	OAKLAND	94607
PHARM			

Appendix ESample Kiosk Mock-Up



Sample Kiosk Signage¹

Drop-Slot Panel Kiosk Art

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

Call (800) 606-6606

or visit Household-HazWaste.org for details.

USA.KA.00.000009.CAL.01.01.45.01.00

Name: 123 Pharmacy

Contact: (555) 555-555

USA KA 01.000011ALL.01.01.45.02.00



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¹ Household Hazardous Waste facilities do not accept illicit drugs.

Sample Kiosk Signage

Front Door Panel Kiosk Art

SAFELY DISPOSE OF EXPIRED OR UNWANTED MEDICINE



Only schedule II-V controlled and non-controlled substances that are lawfully possessed by the ultimate user are acceptable to be placed in the kiosk. Schedule I controlled substances, illicit or dangerous substances, and any controlled substances not lawfully possessed by the ultimate user may not be placed in the kiosk.

⚠ PROP 65 WARNING: Entering this area, or coming into contact with items or materials in this kiosk, can expose you to chemicals known to the State of California to cause cancer and birth defects or other reproductive harm. For more information, go to www.p65Warnings.ca.gov.

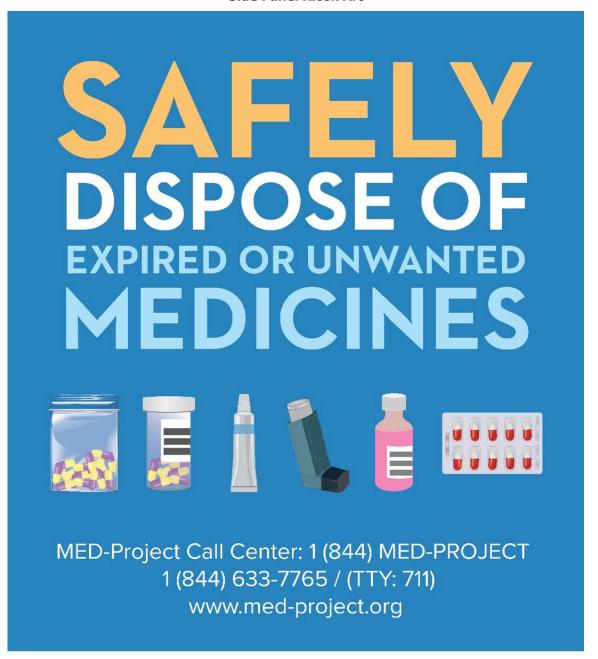
For more information about the MED-Project program, please to go to www.med-project.org or call 1-844-MED-PROJECT / 1 (844) 633-7765 (TTY: 711)



USA KF.01.0000000.SCA.01.02.41.01

Sample Kiosk Signage

Side Panel Kiosk Art





K201000044_010















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

MED-Project™
Medication Education & Disposal

JSAKS 01.000000.ALL 01.02.40.01.0

Appendix F

Media List

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

Print Outlets	Coverage Area	Website		
Alameda Sun	Alameda County	http://alamedasun.com/		
Berkeley Daily Planet	Berkeley	http://berkeleydailyplanet.com		
Berkeley Voice	Berkeley	https://www.eastbaytimes.com/location/berkeley/		
Berkeleyside	Berkeley	http://www.berkeleyside.com		
California Magazine	Berkeley	https://alumni.berkeley.edu/california-magazine		
Castro Valley Times	Castro Valley	https://www.eastbaytimes.com		
Center for Investigative Reporting Berkeley		https://revealnews.org/		
Contra Costa Times Alameda County		http://www.eastbaytimes.com/		
Dublin Tri Valley Herald	Dublin	https://www.eastbaytimes.com/location/tri-valley/		
E'ville Eye Community News	Alameda County	http://www.evilleeye.com/		
Nichi Bei Times (Japanese/English)	Alameda County	https://www.nichibei.org		
East Bay Express	Alameda County	https://www.eastbayexpress.com		
East Bay Times	Alameda County	https://www.eastbaytimes.com		
Fremont Bulletin	Alameda County	http://www.mercurynews.com/fremont		
Fremont Tribune	Alameda County	http://www.fremonttribune.com/		
The Independent	Dublin, Livermore, Pleasanton	http://www.independentnews.com		
Inter-City Express	Oakland	www.intercityexpress.news		

Print Outlets	Coverage Area	Website
La Opinion (Spanish)	Alameda County	http://www.laopinion.com/
Pleasanton Weekly	Alameda County	https://www.pleasantonweekly.com
San Francisco Chronicle	Alameda County	https://www.sfchronicle.com
The Argus	Alameda County	https://www.mercurynews.com/author/fremont- argus/
The Daily Californian (UC Berkeley)	Alameda County	http://www.dailycal.org
The Montclarion	Oakland	http://themontclarion.org
Tri-Valley Times	Pleasanton	https://www.eastbaytimes.com/location/tri-valley/
Tri-City Voice	Alameda County	http://www.tricityvoice.com/
Vision Hispana	Oakland, Hayward	http://www.visionhispanausa.com
Your Town Monthly	Dur Town Monthly Alameda County http://yourtownmonthly.com	

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

Radio Outlets	City/County/Coverage Area
KALW FM 91.7	San Francisco
KCBS AM 740	San Francisco
KCSF (College app radio)	San Francisco
KGO AM 810	San Francisco
KQED FM 88.5	San Francisco
KSFO AM 560	San Francisco
KUSF (College online radio)	San Francisco
KPFB FM 89.3	Berkeley
KALX FM 90.7	Berkeley
KNGY FM 92.7	Alameda
KPFA FM 94.1	Berkeley
KKIQ FM 101.7	Livermore
KBLX FM 102.9	Berkeley
KNEW AM 910	Oakland
KMKY AM 1310	Oakland
KVTO AM 1400	Berkeley
KPIG AM 1510	Piedmont
KACR FM 96.1	Alameda
KCRH FM 89.9	Hayward
KPOO 89.5	San Francisco
KSMC 89.5	Moraga
KCSM 91.1	San Mateo
KKDV 92.1	Walnut Creek

Radio Outlets	City/County/Coverage Area
KRZZ 93.3	San Francisco
KYLD 94.9	San Francisco
KBWF 95.7	San Francisco
KOIT 96.5	San Francisco
KLLC 97.3	San Francisco
KISQ 98.1	San Francisco
KSOL 98.9	San Francisco
KMVQ 99.7	San Francisco
KBRG 100.3	San Jose
KVVZ 100.7	San Rafael
KIOI 101.3	San Francisco
KDFC 190.3	San Francisco
KKSF 103.7	San Francisco
KFOG 104.5	San Francisco
KITS 105.3	San Francisco
KVVF 105.7	Santa Clara
KMEL 106.1	San Francisco
KFRC 106.9	San Francisco
KSTN 107.3	Stockton
KSAN 107.7	San Mateo
KSFO 560 AM	San Francisco
KEAR 610 AM	San Francisco
KSTE 650 AM	Rancho Cordova

Radio Outlets	City/County/Coverage Area
KNBR 680 AM	San Francisco
KFIA 710 AM	Carmichael
KCBC 770 AM	Riverbank
KTRB 860 AM	San Francisco
KATD 990 AM	Pittsburg
KIQI 1010 AM	San Francisco
KTCT 1050 AM	San Mateo
KFAX 1100 AM	San Francisco
KHTK 1140 AM	Sacramento
KLOK 1170 AM	San Jose
KDYA 1190 AM	Vallejo
KNTS 1220 AM	Palo Alto
KSRO 1350 AM	Santa Rosa
KZSF 1370 AM	San Jose
KEST 1450 AM	San Francisco
KFBK 1530 AM	Sacramento
KLIV 1590 AM	San Jose
KDIA 1640 AM	Vallejo
KEBR 88.1	Sacramento
KECG 88.1	El Cerrito
KXPR 88.9	Sacramento
KOHL 89.3	Fremont
KREV 92.7	Alameda

Radio Outlets	City/County/Coverage Area			
KSFN 1510 AM	Piedmont			

Appendix GSample Standard Mail-Back Package



Description:

Plastic envelope with return label and instructional flyer.

Package Size:

Outer dimensions: 8.25" x 12"
Inner dimensions: 7.375" x 10.375"

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

Sample Inhaler Mail-Back Package



Description:

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

Package Size:

Outer dimensions: 9"x 11.5"x 4.5"

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

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

Appendix H

Clean Harbors Aragonite, LLC Enforcement Action Summary Report

Facility Summary



CLEAN HARBORS ARAGONITE LLC

11600 NORTH APTUS ROAD, GRANTSVILLE, UT

84029 ①

FRS ID: 110000906985 EPA Region: 08

Latitude: 40.7344 Longitude: -112.9681

Locational Data Source: E-PLAN

Industries: Professional, Scientific, and Technical Services

Indian Country: N

Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	10	07/27/2021	No Violation Identified	0	0	-	1	\$23,750	-	
RCRA	6	08/30/2021	Violation	10	0	-	5	\$410,630	1	\$224,903

Regulatory Information

Clean Air Act (CAA): Operating Major (UT0000004904500048)

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active LQG, Operating TSDF,

(UTD981552177)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details

Known Data Problems

Other Regulatory Reports

Air Emissions Inventory (EIS): 7428011

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): 84029SFTYK11600

Compliance and Emissions Data Reporting Interface (CEDRI): CEDRI122110

Related Reports

Enforcement Case Report

Air Pollutant Report

View Envirofacts Reports

Enforcement and Compliance

Compliance Monitoring History Last 5 Years •



Statute	Source ID	System	Activity Type	Compliance Monitoring Type	Lead Agency	Date	Finding (if applicable)
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	09/21/2021	Reviewed: 09/30/2021 Facility Reported No Deviations
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	FCE On-Site	State	07/27/2021	
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	09/22/2020	Reviewed: 09/30/2020 Facility Reported Deviations
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	PCE Stack Test	State	07/08/2020	Findings: Pass
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	FCE Off-Site	State	06/16/2020	
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	09/23/2019	Reviewed: 09/24/2019 Facility Reported Deviations
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	FCE On-Site	State	01/22/2019	
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	10/09/2018	Reviewed: 01/30/2019 Facility Reported Deviations
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	FCE On-Site	State	01/23/2018	
CAA	UT0000004904500048	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	12/18/2017	Reviewed: 12/29/2017 Facility Reported No Deviations
RCRA	UTD981552177	ICIS	Inspection/Evaluation	Case Development	EPA	09/12/2019	
RCRA	UTD981552177	ICIS	Inspection/Evaluation	Evaluation	EPA	10/25/2018	
RCRA	UTD981552177	ICIS	Information Request	Formal	EPA	10/02/2018	
RCRA	UTD981552177	ICIS	Inspection/Evaluation	Focused	EPA	08/17/2018	

RCRA	UTD981552177	RCRAInfo	FINANCIAL RECORD REVIEW	State	01/31/2022	No Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	08/30/2021	Undetermined, Agency May Still be Determining
RCRA	UTD981552177	RCRAInfo	FINANCIAL RECORD REVIEW	State	06/28/2021	No Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	FINANCIAL RECORD REVIEW	State	10/07/2020	No Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/09/2020	Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	CASE DEVELOPMENT INSPECTION	EPA	09/10/2019	Violations Or Compliance Issues Were Foun
RCRA	UTD981552177	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/09/2019	Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	FINANCIAL RECORD REVIEW	State	08/30/2019	No Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	FOLLOW-UP INSPECTION	EPA	10/25/2018	No Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/10/2018	Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	EPA	08/14/2018	Violations Or Compliance Issues Were Four
RCRA	UTD981552177	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/11/2017	Violations Or Compliance Issues Were Found
RCRA	UTD981552177	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	EPA	07/26/2017	Undetermined, Agency May Still be Determining

Statu	ite	Source	: ID	С	urrent SNC/F	IPV	Current As Of			vith NC (of 1	2) ①	Data Last Refreshed			
CAA UT0000004904500048			No			022	0			06/17/2022					
RCR	RCRA UTD981552177				No		06/18/2022		10		06/17/2022				
		pliance Hi -											ownload Da		
am/Pollu	tant/Violation	Туре	QTR 1	QTR 2	QTR3	QTR 4	QTR 5	QTR6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	
D: UT0000004904500048)		8)	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/01-	
Facility-	-Level Status		No Violation Identified	No Violation Identifie											
HPV	V History														

gram/Pollutant/Violation	on Type	QTR 1	QTR 2	QTR3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
ource ID: UTD981552177	r)		10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/01- 06/30/22
Facility-Level Status		Violation Identified	Violation	Violation	Violation Identified	No Violation Identified	No Violation Identified	Violation Identified	Violation Identified	Violation	Violation	Violation	Violation
Violation	Agency												
Permit Condition or Requirement	UT								04/08/2021- 05/08/2021				
Standards	UT								04/08/2021- 05/08/2021				
Permit Condition or Requirement	UT								04/08/2021- 05/08/2021				
XS: State Statute or Regulation	UT								04/08/2021- 05/08/2021				
C: Listing- Air Emisions Standards- Tanks/Containers	UT								04/08/2021- 05/08/2021				
I.O: TSD - Incinerator Standards	UT								04/08/2021- 05/08/2021				
I.O: TSD - Incinerator Standards	UT								04/08/2021- 05/08/2021				
: Generators - General	UT								04/08/2021- 05/08/2021				
: Generators - General	UT								04/08/2021- 05/08/2021				
68.A: LDR - General	UT								04/08/2021- 05/08/2021				
Permit Condition or Requirement	UT								04/08/2021- 05/08/2021				
Permit Condition or Requirement	UT				04/08/2020- 05/08/2020								
Permit Condition or Requirement	UT				04/08/2020- 05/08/2020								
Permit Condition or Requirement	UT								04/08/2021- 05/08/2021				
Permit Condition or Requirement	UT								04/08/2021- 05/08/2021				
Permit Condition or Requirement	UT								04/08/2021- 05/08/2021				

Permit Condition or Requirement	UT	03/26/2021	-	→	→	→	→
: TSD - General Facility Standards	UT	03/26/2021	-	→	-	-	-
'.E: Manifest System- cordkeeping, Rpting, Notifying	UT	03/26/2021	-•	-	-	-	-
: Permit Condition or Requirement	UT	03/26/2021	-	-	-	-	-
: Permit Condition or Requirement	UT	03/26/2021	-	-	-	-	-
l: TSD - Container Use and Management	UT	03/26/2021	-	→	$f \mapsto f$	-	-
: Permit Condition or Requirement	UT	03/26/2021	-	→	-	-	-
: Permit Condition or Requirement	UT	03/26/2021	-	-	1 -	→	-
.J: TSD - Tank System Standards	UT	03/26/2021	-	→	-	-	-
: Permit Condition or Requirement	UT	03/26/2021	-	→	-	-	-
: Permit Condition or Requirement	UT	03/26/2021	-	→	-	-	-
68.A: LDR - General	UT	03/26/2021	-	\rightarrow	$f \mapsto f$	→	-
: Permit Condition or Requirement	UT		04/08/2021- 05/08/2021				
l: TSD - General Facility Standards	UT		04/08/2021- 05/08/2021				
: TSD - General Facility Standards	UT		04/08/2021- 05/08/2021				
: TSD - General Facility Standards	UT		04/08/2021- 05/08/2021				
C: TSD - Preparedness and Prevention	UT		04/08/2021- 05/08/2021				
264.E: TSD - est/Records/Reporting	UT		04/08/2021- 05/08/2021				
XS: State Statute or Regulation	UT		04/08/2021- 05/08/2021				
: Permit Condition or Requirement	UT		04/08/2021- 05/08/2021				
264.E: TSD - est/Records/Reporting	UT		04/08/2021- 05/08/2021				

Permit Condition or Requirement	UT						04/08/2021- 05/08/2021		
Permit Condition or Requirement	UT						04/08/2021- 05/08/2021		
: TSD - Container Use and Management	UT						04/08/2021- 05/08/2021		
Permit Condition or Requirement	UT						04/08/2021- 05/08/2021		
C: TSD - Preparedness and Prevention	UT						04/08/2021- 05/08/2021		
264.E: TSD - est/Records/Reporting	UT						04/08/2021- 05/08/2021		
Permit Condition or Requirement	UT						04/08/2021- 05/08/2021		
BB: TSD - Air Emission dards for Equipment Leaks	EPA	08/14/2018	→	-	05/08/2020				
BB: TSD - Air Emission dards for Equipment Leaks	EPA	08/14/2018	-	-	05/08/2020				
BB: TSD - Air Emission dards for Equipment Leaks	EPA	08/14/2018	-	-	05/08/2020				
3B: TSD - Air Emission dards for Equipment Leaks	EPA	08/14/2018	-	-	05/08/2020				
C: TSD - Preparedness and Prevention	EPA	08/14/2018	→	→	05/08/2020				
CC: TSD - Air Emission Standards - anks/SI/Containers	EPA	08/14/2018	-	-	05/08/2020				
CC: TSD - Air Emission Standards - anks/SI/Containers	EPA	08/14/2018	-	-	05/08/2020				
CC: TSD - Air Emission Standards - anks/SI/Containers	EPA	08/14/2018	-	-	05/08/2020				
CC: TSD - Air Emission Standards - unks/SI/Containers	EPA	08/14/2018	-	-	05/08/2020				
CC: TSD - Air Emission Standards - anks/SI/Containers	EPA	08/14/2018	-	-	05/08/2020				
: TSD - General Facility Standards	EPA	08/14/2018	-	-	05/08/2020				
CC: TSD - Air Emission Standards - anks/SI/Containers	EPA	09/10/2019	→	-	05/08/2020				
: TSD - General Facility	EPA	09/10/2019	_	_	05/08/2020				

C: TSD - Preparedness and Prevention	EPA	09/10/2019	-	-	05/08/2020	



 ${\it Entries in italics are not counted as "informal enforcement actions" in {\it EPA policies pertaining to enforcement response tools.}$

Formal Enforcement Actions Last 5 Years V

Statute	System	Law/Section	Source ID	Type of Action	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Act Date
CAA	ICIS-Air	OTHER	AIR/UT0000004904500048	Administrative - Formal	UT000A200163144	State	Early Settlement Agreement	06/08/2018	1	06/08/2018
RCRA	RCRAInfo	-	RCRAINFO/UTD981552177	FINAL 3008(A) COMPLIANCE ORDER	-	State		-	1	02/08/2022
RCRA	ICIS	3004	RCRAINFO/UTD981552177	Administrative - Formal	08-2022-0027	EPA	Clean Harbors Aragonite LLC	12/10/2021	1	12/10/2021
RCRA	RCRAInfo	(#2	RCRAINFO/UTD981552177	RELEASE OF NOTICE OF VIOLATION	-	State			1	08/24/2021
RCRA	RCRAInfo	-	RCRAINFO/UTD981552177	INITIAL 3008(A) COMPLIANCE	-	State	-	-	1	03/26/2021
RCRA	RCRAInfo	-	RCRAINFO/UTD981552177	INITIAL 3008(A) COMPLIANCE	=	State	-	-	1	04/08/2020
RCRA	RCRAInfo	-	RCRAINFO/UTD981552177	FINAL 3008(A) COMPLIANCE ORDER		State		-	1	05/30/2019

Covanta Environmental Solutions, LLC Penalty Record

Facility Summary



COVANTA ENVIRONMENTAL SOLUTIONS

2515 S HOLT RD, INDIANAPOLIS, IN 46241 ①

Related Reports

View Envirofacts Reports

FRS ID: 110070124486 EPA Region: 05

Latitude: 39.72944 Longitude: -86.22521 Locational Data Source: FRS

Industries: Waste Management and Remediation Services

Indian Country: N

Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
RCRA	1	05/15/2018	No Violation Identified	o	0	1	-	120	-	-

Regulatory Information

Clean Air Act (CAA): No Information
Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active Transporter, VSQG, (INR000144303)

Safe Drinking Water Act (SDWA): No Information

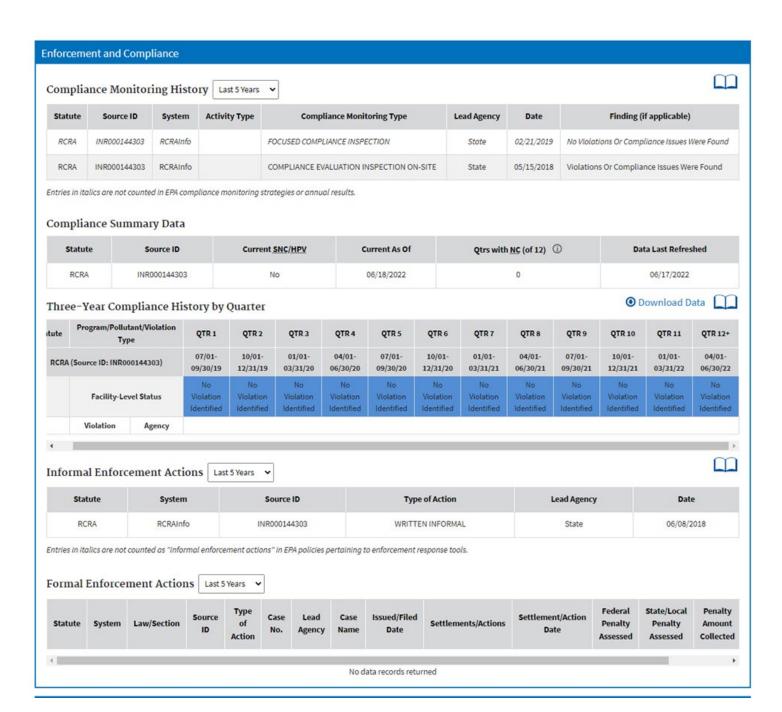
Go To Enforcement/Compliance Details Known Data Problems Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): No Information

Compliance and Emissions Data Reporting Interface (CEDRI): No Information



Curtis Bay Energy Penalty Record

Facility Summary



CURTIS BAY ENERGY, LP

3200 HAWKINS POINT RD, BALTIMORE, MD 21226

1

FRS ID: 110037395734 EPA Region: 03 Latitude: 39.20246 Longitude: -76.55619

Locational Data Source: FRS

Industries: Waste Management and Remediation Services

Indian Country: N

Related Reports

Air Pollutant Report

CWA Pollutant Loading Report

E CWA Effluent Charts

X CWA Effluent Limit Exceedances Report

m

View Envirofacts Reports

Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	-	-	-		**	-		-	-	
CWA	5	08/20/2020	Significant/Category I Noncompliance	12	12	5 7 7			-	-
RCRA	-	-	No Violation Identified	0	0	-	-	-	-	

Regulatory Information

Clean Air Act (CAA): No Information

Clean Water Act (CWA): Minor, Permit Expired (MDR000500)

Resource Conservation and Recovery Act (RCRA): Active Transporter, (MDD985404318)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details

Known Data Problems

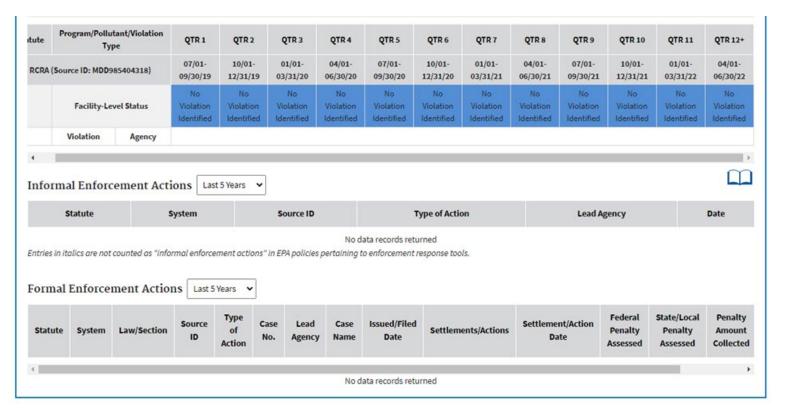
Other Regulatory Reports

Air Emissions Inventory (EIS): 14538311

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): No Information

Compliance and Emissions Data Reporting Interface (CEDRI): No Information



Enforcement and Compliance

Compliance Monitoring History Last 5 Years V



Statute	Source ID	System	Activity Type	Compliance Monitoring Type	Lead Agency	Date	Finding (if applicable)
CWA	MDR000500	ICIS-NPDES	Inspection/Evaluation	Base Program - Evaluation	State	08/20/2020	
CWA	MDR000500	ICIS-NPDES	Inspection/Evaluation	Base Program - Evaluation	State	02/14/2020	
CWA	MDR000500	ICIS-NPDES	Inspection/Evaluation	Base Program - Evaluation	State	01/08/2020	
CWA	MDR000500	ICIS-NPDES	Inspection/Evaluation	Base Program - Evaluation, Sampling	State	12/04/2019	
CWA	MDR000500	ICIS-NPDES	Inspection/Evaluation	Base Program - Evaluation	State	11/08/2019	

Entries in Italics are not counted in EPA compliance monitoring strategies or annual results.

Compliance Summary Data

Statute	Source ID	Current SNC/HPV	Current As Of	Qtrs with NC (of 12)	Data Last Refreshed
CWA	MDR000500	Yes	03/31/2022	12	06/17/2022
RCRA	MDD985404318	No	06/18/2022	0	06/17/2022

Three-Year Compliance History by Quarter





	QTR 5	QTR 6	QTR 7	QTRs	еятр	QTR 10	QTR 11	QTR 12
1/20	04/01-06/30/20	07/01-09/30/20	10/01-12/31/20	01/01-03/31/21	04/01-06/30/21	07/01-09/30/21	10/01-12/31/21	01/01-03/31/22
ategory lance	Significant/Category I Noncompliance							
Report eceived	Failure to Report DMR - Not Received							
cerved	DMR - Not Received	UMR - NOT Recen						
							2	

Heritage Thermal Services – Ohio Penalty Record

Facility Summary



HERITAGE-WTI INC

1250 ST GEORGE ST, EAST LIVERPOOL, OH 43920

1

FRS ID: 110027242320

EPA Region: 05 Latitude: 40.631622 Longitude: -80.54632

Locational Data Source: EIS

Industries: Waste Management and Remediation Services

Indian Country: N

Related Reports

Enforcement Case Report

Air Pollutant Report

■ CWA Pollutant Loading Report

E CWA Effluent Charts

EPA Facility Documents

X CWA Effluent Limit Exceedances Report

View Envirofacts Reports

Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	23	08/16/2021	Violation w/in 1 Year	9	0	17	-). (75)	1	SO
CWA	L.	03/17/2015	No Violation Identified	0	0		-	-	2	-
RCRA	9	03/15/2022	No Violation Identified	0	0	2	-	-	2	-

Regulatory Information

Clean Air Act (CAA): Operating Major (OH0000000215020233)
Clean Water Act (CWA): Minor, Permit Effective (OH0107298)

Resource Conservation and Recovery Act (RCRA): Active LQG, Operating TSDF,

(OHD980613541)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details

Known Data Problems

Other Regulatory Reports

Air Emissions Inventory (EIS): 13429211 Greenhouse Gas Emissions (eGGRT): 1001897

Toxic Releases (TRI): 43920VNRLL1250S

Compliance and Emissions Data Reporting Interface (CEDRI): CEDRI125535, CEDRI90484

Compliance Summary Data

Statute	Source ID	Current SNC/HPV	Current As Of	Qtrs with NC (of 12)	Data Last Refreshed
CAA	OH0000000215020233	No	06/18/2022	9	06/17/2022
CWA	OH0107298	No	03/31/2022	0	06/17/2022
RCRA	OHD980613541	No	06/18/2022	0	06/17/2022

Download Data	а	Dat	load	Down	(D)
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tatute	Pr	ogram/Poll	utant/Violation	Туре	QTR 1	QTR2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9
	CAA (Source	ce ID: OH000	0000021502023	33)	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21
		Facility	-Level Status		Violation Identified	Violation Identified	Violation Identified	Violation Identified	Violation Identified	No Violation Identified	No Violation Identified	Violation Identified	Violation Identified
		НР	V History										
	Violation Type	Agency	Programs	Pollutants									
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	FACIL									09/03/202
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	FACIL	08/30/2019								
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	FACIL				05/15/2020					
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	FACIL					09/11/2020				
CAA	FRV	ОН	CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP	FACIL	08/09/2019								

Pollutant/Violation Type	QTR 1	QTR2	QTR3	QTR 4	QTR 5	QTR 6	QTR7	QTRs	еятр	QTR 10	QTR 11	QTR 12	QTR 13+ ①
: OH0107298)	04/01- 06/30/19	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21		01/01-	04/01- 06/17/22
ty-Level Status	No Violation Identified		No Violation Identified		No liolation dentified	Undetermined							
ty Noncompliance port History													
	ollutant/Violatio	on QTR 1	ı QTR:	2 QTR	QTR 4	QTR5	QTR 6	QTR7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
RCRA (Source ID: O	HD980613541)	07/01 09/30/1					10/01-	01/01- 03/31/21	04/01- 06/30/21	07/01-		01/01-	04/01-
		No	No on Violatio		No on Violatio	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation	No Violation

Informal Enforcement Actions Last 5 Years •

Statute	System	Source ID	Type of Action	Lead Agency	Date
CAA	ICIS-Air	ОН0000000215020233	Notice of Violation	State	05/13/2022
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	02/22/2022
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	11/08/2021
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	08/27/2021
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	05/12/2021
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	02/17/2021
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	11/24/2020
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	09/04/2020
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	05/11/2020
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	02/24/2020
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	11/20/2019
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	08/27/2019
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	05/17/2019
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	02/27/2019
CAA	ICIS-Air	OH0000000215020233	Notice of Violation	State	08/10/2018
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	05/30/2018
CAA	ICIS-Air	OH000000215020233	Notice of Violation	State	02/23/2018
RCRA	RCRAInfo	OHD980613541	WRITTEN INFORMAL	State	09/19/2019
RCRA	RCRAInfo	OHD980613541	WRITTEN INFORMAL	EPA	11/02/2018

 $\textit{Entries in italics are not counted as "informal enforcement actions" in \textit{EPA policies pertaining to enforcement response tools.}$

Statute	System	Law/Section	Source ID	Type of Action	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	Federal Penalty Assessed
CAA	ICIS-Air	112	AIR/OH0000000215020233	Judicial	05- 2015- 5085	EPA	HERITAGE -WTI	10/18/2018	1	-	\$0

Ross Incineration Services Penalty Record

Facility Summary



ROSS INCINERATION SERVICES, INC.

36790 GILES ROAD, GRAFTON, OH 44044 ①

FRS ID: 110000385592 EPA Region: 05 Latitude: 41.324167 Longitude: -82.034722

Locational Data Source: RMP

Industries: Waste Management and Remediation Services

Indian Country: N

Related Reports



Air Pollutant Report

View Envirofacts Reports

Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	13	09/07/2021	No Violation Identified	1	0	4	1	\$0	-	-
RCRA	8	11/18/2021	No Violation Identified	10	6	10	2	\$20,015	1	\$20,015

Regulatory Information

Clean Air Act (CAA): Operating Major (OH0000000247050278)

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active LQG, Operating TSDF,

(OHD048415665)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details

Known Data Problems

Other Regulatory Reports

Air Emissions Inventory (EIS): 8130911

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): 44044RSSNC36790

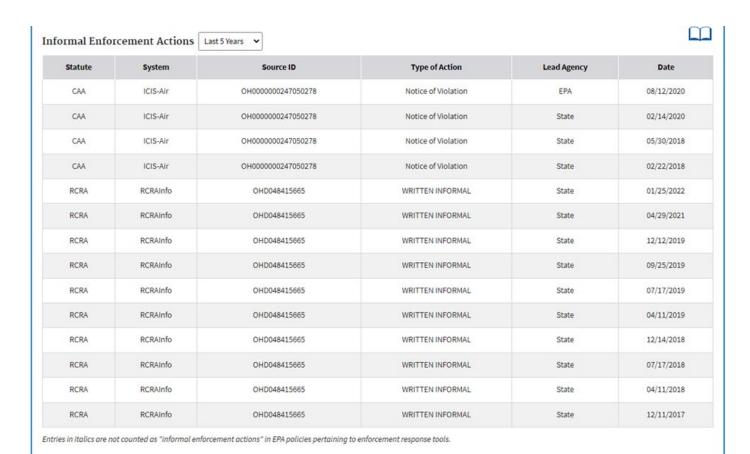
Compliance and Emissions Data Reporting Interface (CEDRI): CEDRI121836

RCRA	OHD048415665	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	11/14/2019	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FACILITY SELF DISCLOSURE	State	10/23/2019	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FINANCIAL RECORD REVIEW	State	09/11/2019	No Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/09/2019	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	NON-FINANCIAL RECORD REVIEW	State	07/30/2019	No Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	06/18/2019	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	03/12/2019	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	11/16/2018	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FINANCIAL RECORD REVIEW	State	09/11/2018	No Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/10/2018	No Violations Or Compliance Issues Web Found
RCRA	OHD048415665	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	06/25/2018	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	03/12/2018	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	11/14/2017	Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	FINANCIAL RECORD REVIEW	State	09/28/2017	No Violations Or Compliance Issues Were Found
RCRA	OHD048415665	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	09/06/2017	No Violations Or Compliance Issues We Found

Entries in Italics are not counted in EPA compliance monitoring strategies or annual results.

Stat	ute	Source	ce ID		Current SNC/	HPV	Current	As Of	Qtrs	with NC (of 1	2) ①	Da	ita Last Refre	shed
CA	VA.	OH0000000	247050278		No		06/18/2	022		1			06/17/2022	2
RC	RA	OHD048	415665		No		06/18/2	022		10			06/17/2022	2
Three	-Year Con	npliance H	listory by	Quarter 4	<u>A</u>							● D	ownload D	ata 🔲
am/Pollu	tant/Violation	Туре	QTR1	QTR 2	QTR 3	QTR 4	QTR5	QTR 6	QTR7	QTR8	QTR 9	QTR 10	QTR 11	QTR 12
D: OH0000	OH0000000247050278)		07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/01-
Facility	Level Status		No Violation Identified	No Violation Identified	Violation Identified	No Violation Identified	No Violation Identifie							
HPV	/ History													
Agency	Programs	Pollutants												
ОН	CAAMACT, CAASIP, CAATVP	FACIL			03/06/2020									

Statute	Program/Pollutant, Type	Violation	QTR 1	QTR2	QTR3	QTR 4	QTR5	QTR 6	QTR 7	QTRs	QTR 9	QTR 10
RCRA	(Source ID: OHD04841	15665)	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/2
	Facility-Level \$	itatus	Violation Identified	Violation Identified	Violation	Significant Noncomplier	Significant Noncomplier	Significant Noncomplier	Significant Noncomplier	Significant Noncomplier	Significant Noncomplier	Violation Identifie
	Evaluation	Agency										
RCRA	Significant Noncomplier	EPA				06/22/2020	-	→	-	-	08/23/2021	
	Violation	Agency										
RCRA	262.A: Generators - General	ОН										11/18/202
RCRA	264.C: TSD - Preparedness and Prevention	ОН										11/18/202
RCRA	264.B: TSD - General Facility Standards	ОН							03/31/2021	04/22/2021		
RCRA	268.E: LDR - Storage Prohibitions	ОН		10/23/2019- 12/04/2019								
RCRA	262.C: Generators - Pre-transport	ОН	09/09/2019- 09/09/2019									
RCRA	262.C: Generators - Pre-transport	ОН	09/09/2019- 09/09/2019									
RCRA	264.B: TSD - General Facility Standards	ОН		10/23/2019- 10/23/2019								
RCRA	264.B: TSD - General Facility Standards	ОН		10/23/2019- 12/04/2019								
RCRA	270.B: Permits - Application	EPA	02/23/2018	-	-	-	-	-	-	-	09/01/2021	



tatute	System	Law/Section	Source ID	Type of Action	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	F
CAA	ICIS-Air	112D	AIR/OH000000247050278	Administrative - Formal	05- 2022- 5012	EPA	ROSS INCINERATION SERVICES, INC ACO	03/18/2022	1	03/18/2022	
RCRA	ICIS	3005	RCRAINFO/OHD048415665	Administrative - Formal	05- 2021- 9939	EPA	Ross Incineration Inc	08/23/2021	1	08/23/2021	9
RCRA	RCRAInfo	-	RCRAINFO/OHD048415665	FINAL 3008(A) COMPLIANCE ORDER		EPA	-	-	1	08/23/2021	5
RCRA	RCRAInfo	-	RCRAINFO/OHD048415665	INITIAL 3008(A) COMPLIANCE		EPA	-	-	1	08/22/2021	

Stericycle, Inc., Warren, Ohio Facility Penalty Record

Facility Summary



STERICYCLE INC

1901 PINE AVE SE, WARREN, OH 44483 ①

FRS ID: 110004639213

EPA Region: 05

Latitude: 41.22125

Longitude: -80.803333

Locational Data Source: EIS

Industries: Waste Management and Remediation Services

Indian Country: N

Related Reports

Air Pollutant Report

View Envirofacts Reports



Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	13	01/25/2021	No Violation Identified	0	0	1	-		-	
RCRA	-	09/25/2007	No Violation Identified	0	0	-		=	-	-

Regulatory Information

Clean Air Act (CAA): Operating Major (OH0000000278080634)

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active Other, (OHD980795280)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details Known Data Problems

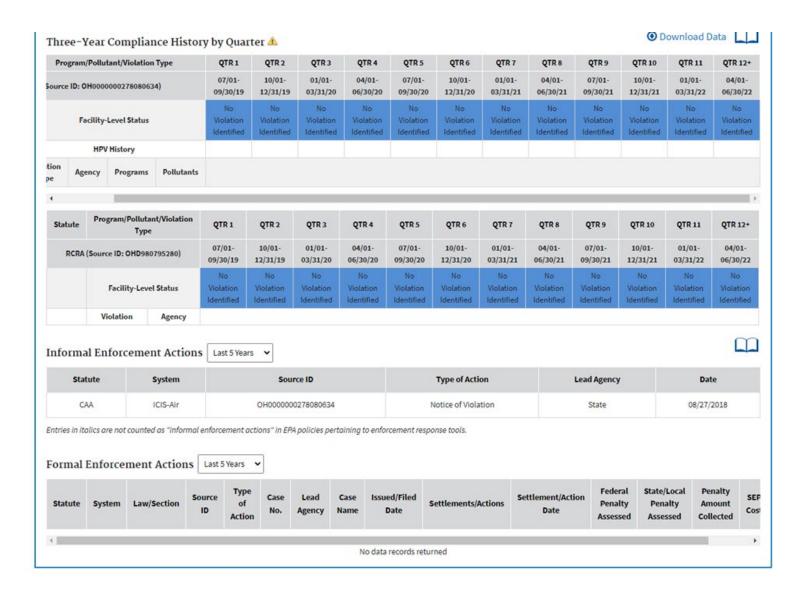
Other Regulatory Reports

Air Emissions Inventory (EIS): 9219811

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): No Information

Compliance and Emissions Data Reporting Interface (CEDRI): No Information



Veolia – Port Arthur Penalty Record

Facility Summary



VEOLIA ES TECHNICAL SOLUTIONS LLC PORT ARTHUR FACILITY

7665 HWY 73, BEAUMONT, TX 77705 ①

FRS ID: 110035783658 EPA Region: 06 Latitude: 29.853056 Longitude: -94.095278

Locational Data Source: FRS **Industries:** Waste Management and Remediation Services

Indian Country: N

Related Reports

Enforcement Case Report

Air Pollutant Report

CWA Pollutant Loading Report

E CWA Effluent Charts

EPA Facility Documents

X CWA Effluent Limit Exceedances Report

View Envirofacts Reports



Enforcement and Compliance Summary

Statute	Compliance Monitoring Activities (5 years)	Date of Last Compliance Monitoring Activity	Compliance Status	Qtrs with NC (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	29	03/25/2022	No Violation Identified	1	0	2	-		-	-
CWA	1	08/04/2020	No Violation Identified	10	0	-	-	-	-	-
RCRA	8	02/09/2022	No Violation Identified	5	0	3	-	-	-	-

Regulatory Information

Clean Air Act (CAA): Operating Major (TX0000004824500118)

 $\textbf{Clean Water Act (CWA):} \ \ \textbf{Minor, Permit Terminated; Compliance Tracking Off (TX0083810), Minor, Permit Effective (TX0083828)$

Resource Conservation and Recovery Act (RCRA): Inactive Other, (TXD000761262), Active LQG, TSDF, (TXR000036251), Active Other, (TXR000062489), Active LQG, Operating TSDF, Transporter, (TXD000838896)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details

Known Data Problems

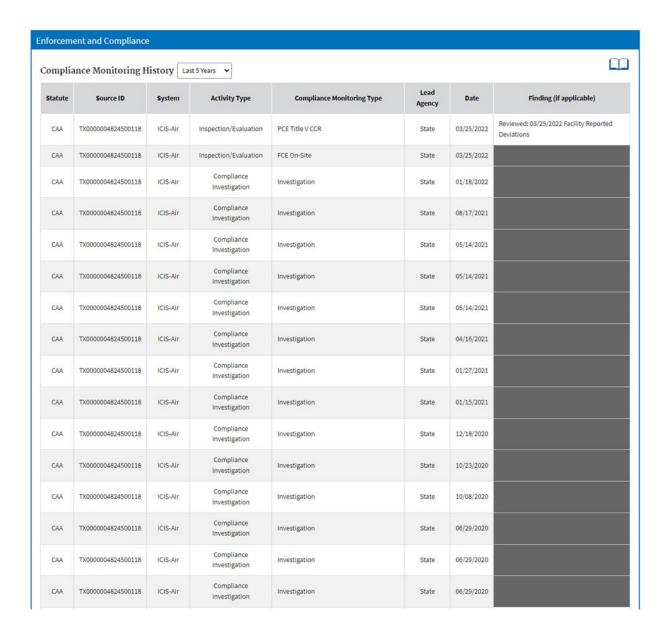
Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): 77643WSTMNHWY73

Compliance and Emissions Data Reporting Interface (CEDRI): CEDRI122147



CAA	TX0000004824500118	ICIS-Air	Inspection/Evaluation	PCE Stack Test	State	04/29/2020	Findings: Pass Pollutants: FACIL
CAA	TX0000004824500118	ICIS-Air	Inspection/Evaluation	PCE Stack Test	State	04/29/2020	Findings: Pass Pollutants: FACIL
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	04/27/2020	
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	02/13/2020	
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	02/13/2020	
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	02/13/2020	
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	02/13/2020	
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	09/16/2019	
CAA	TX0000004824500118	ICIS-Air	Inspection/Evaluation	FCE On-Site	State	03/08/2019	
CAA	TX0000004824500118	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	03/08/2019	Reviewed: 03/08/2019 Facility Reported Deviations
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	10/10/2018	
CAA	TX0000004824500118	ICIS-Air	Inspection/Evaluation	PCE Title V CCR	State	04/17/2018	Reviewed: 04/17/2018 Facility Reported Deviations
CAA	TX0000004824500118	ICIS-Air	Compliance Investigation	Investigation	State	09/21/2017	
WA	TX0083828	ICIS- NPDES	Inspection/Evaluation	Base Program - Evaluation	State	08/04/2020	

RCRA	TXD000838896	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	11/09/2021	Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	11/25/2020	No Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	NON-FINANCIAL RECORD REVIEW	State	10/01/2020	No Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	02/06/2020	Violations Or Compliance Issues Were Four
RCRA	TXD000838896	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	02/06/2020	No Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	06/25/2019	No Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	FOCUSED COMPLIANCE INSPECTION	State	06/25/2019	No Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	NON-FINANCIAL RECORD REVIEW	State	10/24/2018	No Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	06/13/2018	Violations Or Compliance Issues Were Found
RCRA	TXD000838896	RCRAInfo	NON-FINANCIAL RECORD REVIEW	State	04/23/2018	No Violations Or Compliance Issues Were Found
RCRA	TXR000036251	RCRAInfo	OPERATION AND MAINTENANCE INSPECTION	State	02/09/2022	No Violations Or Compliance Issues Were Found
RCRA	TXR000062489	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	02/12/2020	No Violations Or Compliance Issues Were Found
RCRA	TXR000062489	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	06/26/2019	No Violations Or Compliance Issues Were Found
RCRA	TXR000062489	RCRAInfo	COMPLIANCE EVALUATION INSPECTION ON-SITE	State	07/18/2018	No Violations Or Compliance Issues Were Found

Statute		Source ID		Curr	ent SNC/HPV		Current As	Of	Qtrs wi	th <u>NC</u> (of 12)	①	Dat	ta Last Refres	hed
CAA	TX	000000482450	0118		No		06/18/202	22		1			06/17/2022	
CWA		TX0083810			No		03/31/202	22		0			06/17/2022	
CWA		TX0083828			No		03/31/202	22		10			06/17/2022	
RCRA		TXD00076126	2		No		06/18/202	22		0		06/17/2022		
RCRA		TXR00003625	1		No		06/18/202	22	0				06/17/2022	
RCRA		TXR00006248	9		No		06/18/202	12		0			06/17/2022	
RCRA		TXD00083889	6		No		06/18/202	22		5			06/17/2022	
Three-Yea	r Complia	nce Histor	ry by Qua	rter 📤								● D	ownload Da	ata 🔲
Program/Pollu	tant/Violation	Туре	QTR1	QTR2	QTR3	QTR 4	QTR 5	QTR 6	QTR7	QTR8	QTR9	QTR 10	QTR 11	QTR 124
urce ID: TX000	000482450011	8)	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/01-
Facility	No No No No Facility-Level Status Violation Violation Violation Identified Identified Identified						No Violation Identified	No Violation Identified	Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified
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Statute	Progra	m/Polluta	nt/Violation Typ	e	QTR 1	QTR 2	QTR 3	QTR4	QTR	15	QTR 6	QTF	27	QTR8
	CWA (Sou	rce ID: TX	0083810)		04/01- 06/30/19	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/0 06/30		07/01- 09/30/20	10/0		01/01-
		Facility-L	evel Status		Terminated Permit	Terminated Permit	Terminated Permit	Terminated Permit	Termin		Terminated Permit	Termin		Terminate
	Quarterly	Noncomp	liance Report Hi	story	1.511115	3 2000	7 4311114	7 411111						
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	CWA (Sou	rce ID: TX	0083828)		06/30/19	09/30/19	12/31/19	03/31/20	06/30)/20	09/30/20	12/3	1/20	03/31/2
		Facility-L	evel Status		Violation Identified	Violation Identified	Violation Identified	Violation Identified	Violat Identi		Violation Identified	Viola Ident		Violation Identifie
	Quarterly	Noncomp	liance Report Hi	story	Other Violation	Reportable Noncompliance	Reportable Noncompliance	Reportable Noncompliance	Report		Reportable Noncompliano	Report e Noncom		Reportab
	Pollutant	Disch Point	Mon Loc	Freq										
	Chlorine,	Folia	Intermediate											
▶ CWA	total residual	101 - A	Treatment, Process Complete	NMth	396									
▶ CWA	E. coli 🔳	101 - A	Effluent Gross	NMth	35%						326%			30%
▶ CWA	Flow, in conduit or thru treatment	101 - A	Intermediate Treatment, Process	NMth		34%								
	plant 🔳		Complete											
▶ CWA	Solids, total suspended	101 - A	Intermediate Treatment, Process Complete	Mthly		275%								
▶ CWA	Solids, total suspended	101 - A	Intermediate Treatment, Process Complete	NMth		16296								
	Per	mit Sched	lule Violations											
CWA	Status/Progre	ss Report												01/15/202
CWA	Achieve Final Discharge Lim		ce With Emission	or										
			arge Monitoring	Report										
	Counts of Late	DMR Mea	surements			2								
	Counts of Miss	sing DMR N	Measurements			2								
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Statute	Program/Poli	utant/Vio ype	lation QTR	1	QTR2 Q	QTR3 QTR4	QTR5	QTR 6	QTR 7	QTR 8	QTR9	QTR 10	QTR 11	QTR
RCRA	(Source ID: TXD	00076126	07/0 09/30			1/01- 04/01- /31/20 06/30/2				04/01- 6/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/0
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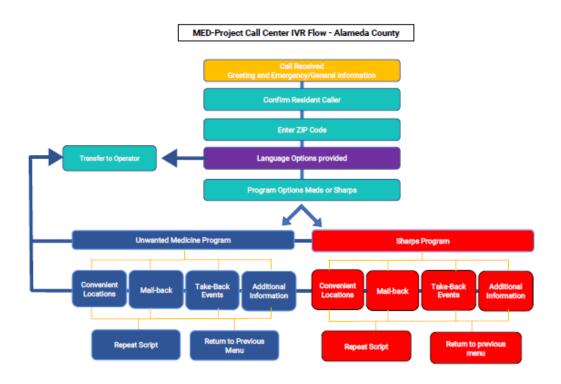
	Violation	Agency												
RCRA	(Source ID: TXD0008	38896)	07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/0: 06/30/
	Facility-Level S	Status	No Violation Identified	No Violation Identified	Violation Identified	Violation	Violation	Violation	No Violation Identified	No Violation Identified	No Violation Identified	Violation Identified	No Violation Identified	No Violat Identii
	Violation	Agency												
RCRA	270.A: Permits - General Information	TX			02/14/2020	-	-	10/08/2020						
RCRA	262.A: Generators - General	TX										11/09/2021- 11/10/2021		
RCRA	262.A: Generators - General	TX										11/09/2021- 11/19/2021		
RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA	268.E: LDR - Storage Prohibitions	TX			02/14/2020		-	10/08/2020						
RCRA	268.A: LDR - General	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.I: TSD - Container Use and Management	TX			02/14/2020	-	-	10/08/2020						

RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA	264.B: TSD - General Facility Standards	TX			02/14/2020	-	-	10/08/2020						
RCRA	XXS: State Statute or Regulation	TX			02/14/2020	-	-	10/08/2020						
RCRA (Source ID: TXR000036251)		07/01- 09/30/19	10/01- 12/31/19	01/01- 03/31/20	04/01- 06/30/20	07/01- 09/30/20	10/01- 12/31/20	01/01- 03/31/21	04/01- 06/30/21	07/01- 09/30/21	10/01- 12/31/21	01/01- 03/31/22	04/0 06/30	
	Facility-Level !	Status	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	Violat Identi
	Violation	Agency												
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Statute	System	Law/Section	Source ID	Type of Action	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date
CAA	ICIS-Air	OTHER	AIR/TX0000004824500118	Administrative	TX000A708584082021039	State	_	02/28/2022	-	

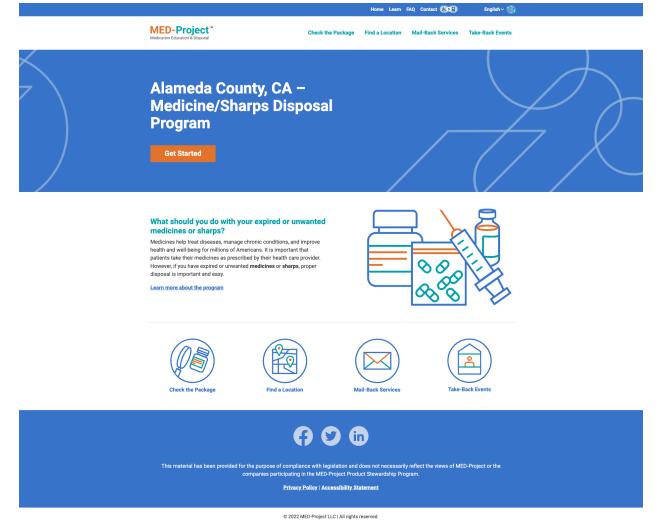
Appendix I

Sample Education and Outreach Call Center



Appendix J

Sample MED-Project Website Home Page



Sample MED-Project Website Check The Package Page

Home Learn FAQ Contact ♣>■ English > ●

MED-Project™

Check the Package Find a Location Mail-Back Services Take-Back Events

Check The Package



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

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

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







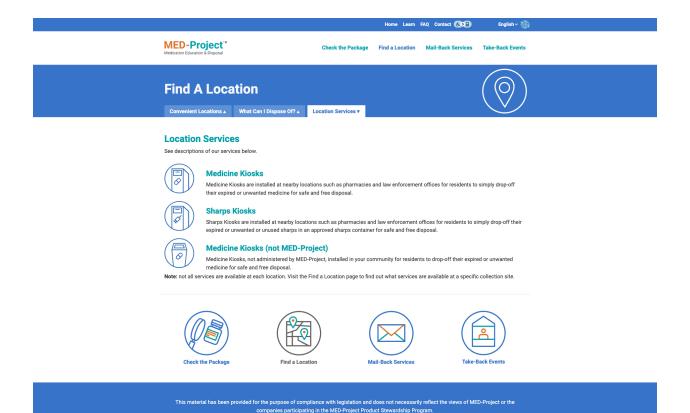


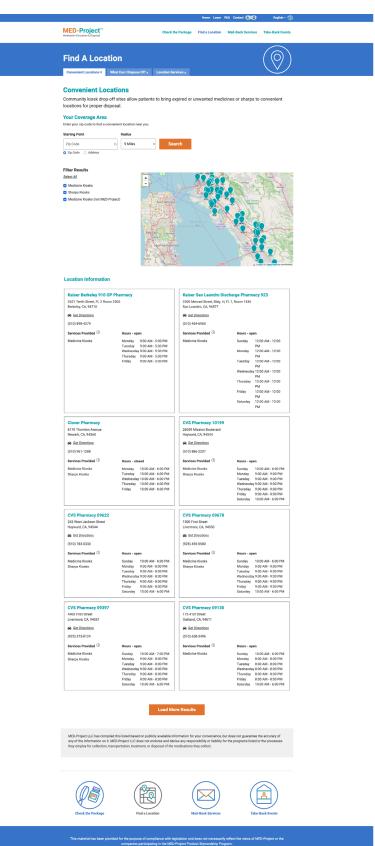




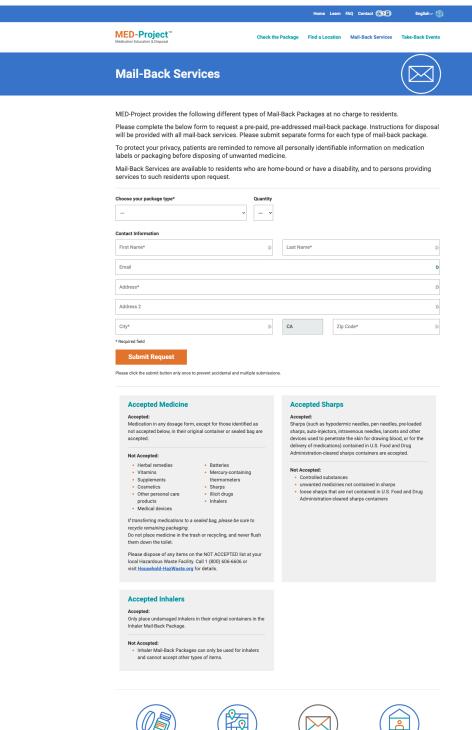
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Sample MED-Project Website Convenient Locations Pages





Sample MED-Project Website Mail Back Page











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Sample MED-Project Website Take-Back Events Page

Home Learn FAQ Contact ♣>■

MED-Project™

Find a Location Mail-Back Services Take-Back Events

Take-Back Events



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

Calendar Of Local Take-Back Events

05-01-2022

San Leandro One-Day Event

Get Directions 14200 Chapman Road

San Leandro, California 94578 Start time: 9:00 AM End time: 1:00 PM

Accepted Medicine

Link to website

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

Medical devices

Batteries
 Mercury-containing

thermometers

Not Accepted:

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

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

Do not place medicine in the trash or recycling, and never flush

them down the toilet.

Please dispose of any items on the NOT ACCEPTED list at your local Hazardous Waste Facility. Call 1 (800) 606-6606 or visit Household-HazWaste.org for details.

Accepted Sharps

Sharps (such as hypodermic needles, pen needles, pre-loaded sharps, auto-injectors, intravenous needles, lancets and other devices used to penetrate the skin for drawing blood, or for the delivery of medications) contained in U.S. Food and Drug Administration-cleared sharps containers are accepted.

- Controlled substances
- unwanted medicines not contained in sharps
 loose sharps that are not contained in U.S. Food and Drug Administration-cleared sharps containers

plastic, able to close with a tight-fitting, puncture resistant limit without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as "sharps waste" or with the biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.









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Privacy Policy | Accessibility Statement

Sample MED-Project Website MEDfaq Page



Check the Package Find a Location Mail-Back Services Take-Back Events

Frequently Asked Questions



What is MED-Project?	~
What should I do if I am having a medical emergency?	~
What should I do if I think I have ingested something poisonous?	~
What should I do if I think I or someone in my household has been stuck by a used sharp?	~
What should I do if my pet has ingested medication?	~
Whom should I call with a question about my medication or sharps?	~
Where can I find information about the safe storage of medication or sharps?	~
How do I dispose of my expired or unwanted medicine or sharps?	~
Should I remove my personal information before disposing of my medication or sharps?	~
Where are the MED-Project disposal locations nearest me?	~
Will it cost me anything to dispose of my expired or unwanted medications or sharps?	~
Can I flush my medication or sharps down the toilet?	~
What items can I dispose of in the MED-Project kiosks?	~
Will there be any take-back events in my area?	~
Where else can I find information about the safe disposal of expired or unwanted medicines or sharps?	~
I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?	~
What is recommended for safe disposal of expired or unwanted medicine and/or sharps in Alameda County?	~
Where can I find information about California's Prop 65?	~
Where can I find more information on the Alameda County Safe Drug Disposal Ordinance?	~









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Sample MED-Project Website Contact Page

Home Learn FAQ Contact ♠>□

MED-Project™

Check the Package Find a Location Mail-Back Services Take-Back Events

Contact



Residents

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

1 (844) MED-PROJECT or 1 (844) 633-7765 or (TTY: 711)

Email Inquiries for Medicine Disposal:

Alameda@med-project.org
Email Inquiries for Sharps

Disposal: AlamedaSharps@med-project.org

For answers to some frequently asked questions, visit the

Convenient Locations

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

Mational Program Director
MED-Project LLC
Phone: 1 (833) MED-PROJECT or 1 (833) 633-7765
Fax: 1 (866) 633-1812 Email AlamedaSupport@med-project.org

Drug Producers

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

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

Sharps Producers

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

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

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

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









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Appendix K

Sample Brochure

WHAT SHOULD **YOU DO WITH YOUR EXPIRED OR UNWANTED MEDICINE?**

There are a number of ways

to dispose of expired or

unwanted medicine.

MED-Project[™]

Medication Education & Disposal

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

What should you do with your expired or unwanted medicine?



Medicine helps treat diseases, manages chronic conditions, and improves health and well-being for millions of Americans. It is important that patients take their medicine as prescribed by their health care provider, and as indicated on the label or packaging. It is also important to be sure to store medicine securely to prevent accidental ingestion or misuse by others, especially children.

If you have expired or unwanted medicine, proper disposal is easy. To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.



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ENGLISH

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Please dispose of any items on the NOT ACCEPTED list at your local Hazardous Waste Facility. Call 1 (800) 606-6606

MED-Project[™] Medication Education & Disposal www.med-project.org

or visit Household-HazWaste.org for details.

DISPOSAL OF HOUSEHOLD MEDICINE

1 CHECK THE PACKAGE



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

2 CONVENIENT LOCATIONS



To find kiosk sites in your area, visit the Convenient Locations section of www.med-project.org.

MAIL-BACK



Mail-Back Services are available in your area. To order a Mail-Back package, visit the Mail-Back section of www.med-project.org.

What items can I dispose of at a kiosk?



ACCEPTED:

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

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



NOT ACCEPTED:

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

DISPOSAL OF HOUSEHOLD MEDICINE

4 TAKE-BACK EVENTS



Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicine. Visit the Take-Back Events section of www.med-project.org for information on events in your area.





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

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