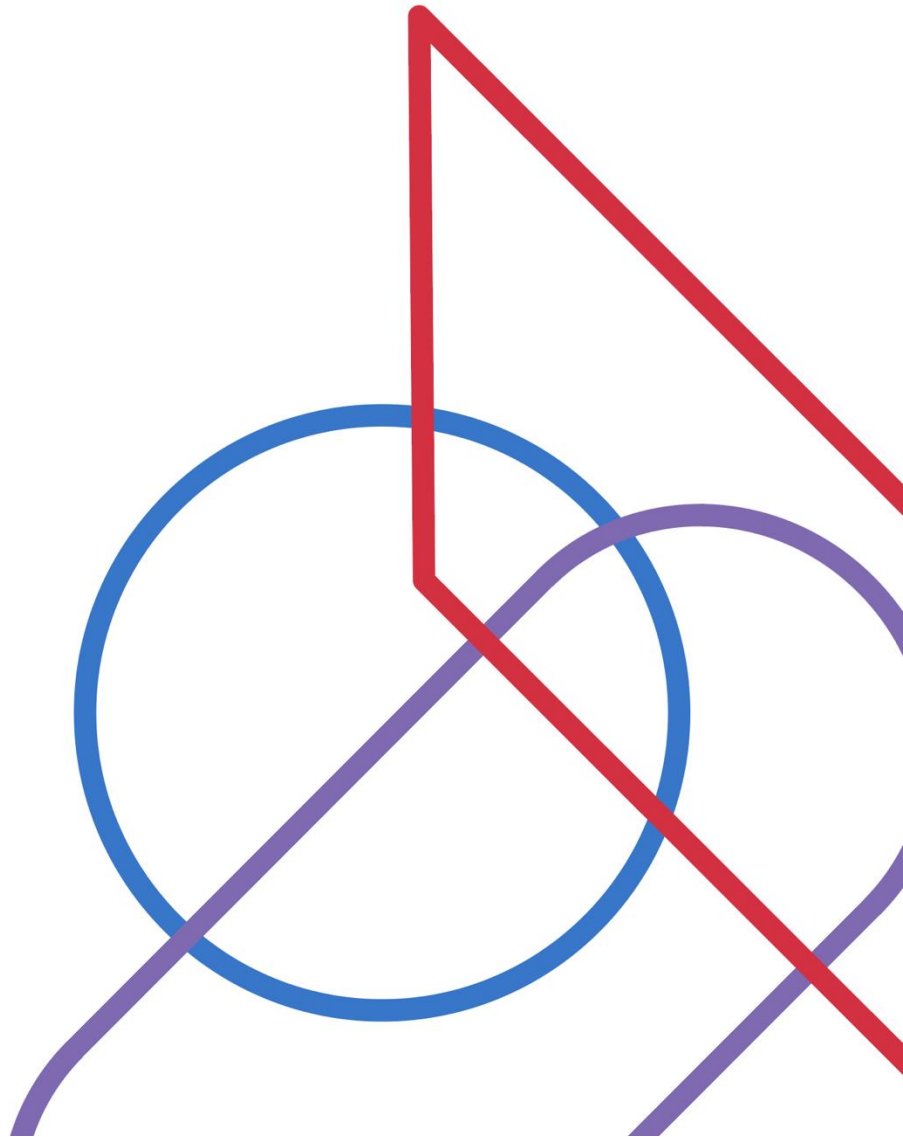
MED-Project®
Medication Education & Disposal

# A Product Stewardship Plan for Household Pharmaceutical Waste

San Mateo County, CA

April 14, 2023; Revised March 21, 2024



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# Executive Summary

MED-Project LLC ("MED-Project") develops, implements, and operates stewardship programs for Unwanted Medicine from households on behalf of hundreds of Producers (as defined in the County of San Mateo Safe Medicine Disposal Ordinance, San Mateo County Ordinance Code 4.116.010 – 4.116.190). MED-Project has substantial, practical, on-the-ground experience implementing Unwanted Medicine take-back programs in jurisdictions across the country, including the County of San Mateo. MED-Project currently administers an approved Stewardship Plan in the County of San Mateo, which has been in operation since December 2016, and has served San Mateo County residents by collecting over 178,000 pounds of Unwanted Medicine from households since 2016 through a wide network of conveniently located unwanted medicine drop off sites. Further, MED-Project's outreach and education efforts have thus far resulted in over 43,000,000 impressions, stemming from its comprehensive education and outreach program.

# I. Introduction

MED-Project, on behalf of the participating companies identified, submits this Product Stewardship Plan ("Plan") for Unwanted Medicine in compliance with the County of San Mateo Safe Medicine Disposal Ordinance, San Mateo County Ordinance Code 4.116.010 – 4.116.190 ("Ordinance"). The Ordinance requires pharmaceutical Producers to develop a Product Stewardship Program to finance and manage the collection, transportation, and disposal of Unwanted Medicine from San Mateo County Residents.

## A. Participating Producers

MED-Project provides periodic updates, on a schedule established with the County of Producers that participate in the Plan in accordance with Ordinance 4.116.040(a). Below is a subset of the information provided on January 11, 2024. Certain identification information was removed for readability. The full list of MED-Project's participating Producers with all required contact and other information was provided as a separate attachment to the County on January 11, 2024.

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| 3M Corporation | 3M Corporation | 3M Center 275-5W-06 | Saint Paul | Minnesota | 55144 | United States |
| 3M Corporation | 3M ESPE Dental Products | 3M Center 275-5W-06 | Saint Paul | Minnesota | 55144 | United States |
| 3M Corporation | 3M Health Care | 3M Center 275-5W-06 | Saint Paul | Minnesota | 55144 | United States |
| 60 Degrees Pharmaceuticals, Inc. | 60 Degrees Pharmaceuticals, Inc. | 1025 Connecticut Ave NW Suite Suite 1000 | Washington | District of Columbia | 20036 | United States |
| A-S Medication Solutions LLC | A-S Medication Solutions LLC | 2401 Commerce Drive | Libertyville | Illinois | 60048 | United States |
| AbbVie Inc. | AbbVie Inc. | 1 North Waukegan Road | North Chicago | Illinois | 60064 | United States |
| AbbVie Inc. | Allergan USA, Inc. | 5 Giralda Farms | Madison | New Jersey | 07940-1027 | United States |
| AbbVie Inc. | Pharmacyclics, subsidiary of AbbVie Inc. | 999 East Arques Avenue | Sunnyvale | California | 94085 | United States |
| ACADIA Pharmaceuticals Inc. | ACADIA Pharmaceuticals Inc. | 12830 El Camino Real, Suite 400 | San Diego | California | 92130 | United States |
| Acorda Therapeutics, Inc. | Acorda Therapeutics, Inc. | 2 Blue Hill Plaza, 3rd Flr | Pearl River | New York | 10965 | United States |
| Advantice Health | Advantice Health | 685 Route 202/206, Suite 202 | Bridgewater | New Jersey | 8807 | United States |
| Afaxys Inc. | Afaxys Inc. | PO Box 20639 | Charleston | South Carolina | 29413 | United States |
| Afaxys Inc. | Afaxys Pharmaceuticals (a division of Afaxys Inc.) | PO Box 20639 | Charleston | South Carolina | 29413 | United States |
| Agile Therapeutics, Inc. | Agile Therapeutics, Inc. | 500 College Road East, Suite 310 | Princeton | New Jersey | 08540 | United States |
| Aidance Scientific, Inc. | Aidance Scientific, Inc. | 184 Burnside Avenue | Woonsocket | Rhode Island | 02895 | United States |
| Ajanta Pharma USA Inc. | Ajanta Pharma USA Inc. | 440 US Highway 22 E. STE 150 | Bridgewater | New Jersey | 08807 | United States |
| Akebia Therapeutics, Inc. | Akebia Therapeutics, Inc. | 245 First Street | Cambridge | Massachusetts | 02142 | United States |
| Akebia Therapeutics, Inc. | Keryx Biopharmaceuticals, Inc. | 245 First Street | Cambridge | Massachusetts | 02142 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Alembic Pharmaceuticals Inc. | Alembic Pharmaceuticals Inc. | 550 Hills Drive Ste 104B | Bedminster | New Jersey | 07921 | United States |
| Allegis Pharmaceuticals, LLC | Allegis Pharmaceuticals, LLC | 276 Nissan Parkway F100 | Canton | Mississippi | 39046 | United States |
| Almirall LLC | Almirall LLC | 101 Lindenwood Drive Suite 400 | Malvern | Pennsylvania | 19355 | United States |
| Alora Pharmaceuticals, LLC | Alora Pharmaceuticals, LLC | 1880 McFarland Pkwy Ste 110 | Alpharetta | Georgia | 30005-1795 | United States |
| Alora Pharmaceuticals, LLC | Acella Pharmaceuticals, LLC | 1880 McFarland Parkway Suite 110 | Alpharetta | Georgia | 30005-1795 | United States |
| Alora Pharmaceuticals, LLC | Avion Pharmaceuticals, LLC | 1880 McFarland Parkway Suite 105 | Alpharetta | Georgia | 30005 | United States |
| Alora Pharmaceuticals, LLC | Trigen Laboratories LLC | 1880 McFarland Pkwy Ste 110 | Alpharetta | Georgia | 30005-1795 | United States |
| Alora Pharmaceuticals, LLC | Vertical Pharmaceuticals, LLC | 1880 McFarland Pkwy Ste 110 | Alpharetta | Georgia | 30005-1795 | United States |
| Alvogen Pharma US, Inc. | Alvogen Pharma US, Inc. | 44 Whippany Road | Morristown | New Jersey | 07960 | United States |
| Alvogen Pharma US, Inc. | Almaject, Inc. | 44 Whippany Road | Morristown | New Jersey | 07960 | United States |
| Alvogen Pharma US, Inc. | Almatica Pharma, LLC | 44 Whippany Road | Morristown | New Jersey | 07960 | United States |
| Alvogen Pharma US, Inc. | Alvogen, Inc. | 44 Whippany Road | Morristown | New Jersey | 07960 | United States |
| Alvogen Pharma US, Inc. | Norwich Pharmaceuticals, Inc. | 6829 State Highway 12 | Norwich | New York | 13815 | United States |
| Amarin Pharma, Inc. | Amarin Pharma, Inc. | 440 US Highway 22 Ste 300 | Bridgewater | New Jersey | 08807-2477 | United States |
| Amgen Inc. | Amgen Inc. | One Amgen Center Drive | Thousand Oaks | California | 91320 | United States |
| Amgen Inc. | Amgen USA | One Amgen Center Drive | Thousand Oaks | California | 91320 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Amgen Inc. | ChemoCentryx | One Amgen Center Drive | Thousand Oaks | California | 91320 | United States |
| Amgen Inc. | Immunex Corporation | One Amgen Center Drive | Thousand Oaks | California | 91320 | United States |
| Amgen Inc. | Kai Pharmaceuticals | One Amgen Center Drive | Thousand Oaks | California | 91320 | United States |
| Amgen Inc. | Onyx Pharmaceuticals | 249 N. Grand Avenue | South San Francisco | California | 94080 | United States |
| Amneal Pharmaceuticals LLC | Amneal Pharmaceuticals LLC | 400 Crossing Blvd Third Floor | Bridgewater | New Jersey | 08807 | United States |
| Amphastar Pharmaceuticals, Inc. | Amphastar Pharmaceuticals, Inc. | 11570 Sixth Street | Rancho Cucamonga | California | 91730 | United States |
| Amphastar Pharmaceuticals, Inc. | International Medication Systems, LTD | 1886 Santa Anita Ave | South El Monte | California | 91733 | United States |
| Amring Pharmaceuticals Inc. | Amring Pharmaceuticals Inc. | 1205 Westlakes Drive Suite 275 | Berwyn | Pennsylvania | 19312 | United States |
| ANI Pharmaceuticals, Inc. | ANI Pharmaceuticals, Inc. | 210 West Main Street | Baudette | Minnesota | 56623 | United States |
| Apotex Holdings, Inc. | Apotex Holdings, Inc. | 150 Signet Drive | Toronto | Ontario | M9L 1T9 | Canada |
| Apotex Holdings, Inc. | Apotex Corp. | 2400 N. Commerce Parkway Suite 400 | Weston | Florida | 33326 | United States |
| Aprecia Pharmaceuticals, LLC | Aprecia Pharmaceuticals, LLC | 10901 Kenwood Road | Blue Ash | Ohio | 45242 | United States |
| Arbor Pharmaceuticals, LLC | Arbor Pharmaceuticals, LLC | 6 Concourse Parkway Suite 1800 | Atlanta | Georgia | 30328 | United States |
| Arbor Pharmaceuticals, LLC | Wilshire Pharmaceuticals | 6 Concourse Parkway Suite 1800 | Atlanta | Georgia | 30328 | United States |
| Arcadia Consumer Healthcare | Arcadia Consumer Healthcare | 440 US Highway 22 - Suite 210 | Bridgewater | New Jersey | 08807 | United States |
| Arcadia Consumer Healthcare | Atlantis Consumer Healthcare Inc. | 440 US Highway 22 - Suite 210 | Bridgewater | New Jersey | 08807 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Arcadia Consumer Healthcare | Kramer Laboratories Inc | 440 US Highway 22 | Bridgewater | New Jersey | 8807 | United States |
| Arcadia Consumer Healthcare | Rowpar Pharmaceuticals | 440 US Highway 22 - Suite 210 | Bridgewater | New Jersey | 08807 | United States |
| Arcutis Biotherapeutics, Inc | Arcutis Biotherapeutics, Inc | 3027 Townsgate Road, Suite 300 | Westlake Village | California | 91361 | United States |
| Ardelyx | Ardelyx | 400 Fifth Avenue Suite 210 | Waltham | Massachusetts | 02451 | United States |
| Armas Pharmaceuticals LLC | Armas Pharmaceuticals LLC | 303 West Main Street Suite 300 | Freehold | New Jersey | 07728 | United States |
| Ascend Therapeutics US, LLC | Ascend Therapeutics US, LLC | 15 Mount Kemble Avenue | Morristown | New Jersey | 07960 | United States |
| Ascendis Pharma Endocrinology, Inc. | Ascendis Pharma Endocrinology, Inc. | 902 Carnegie Center Blvd., Ste 300 | Princeton | New Jersey | 8540 | United States |
| Assertio Therapeutics, Inc. | Assertio Therapeutics, Inc. | 100 South Saunders Rd Suite 300902 Carnegie Center Blvd., Ste 300 | Lake ForestPrinceton | IllinoisNew Jersey | 60045-250808540 | United States |
| Astellas Pharma US, Inc. | Astellas Pharma US, Inc. | 2375 Waterview Drive | Northbrook | Illinois | 60062 | United States |
| Astellas Pharma US, Inc. | Iveric bio, Inc. | 8 Sylvan Way | Parsippany-Troy HillsNorthbrook | New JerseyIllinois | 0705460062 | United States |
| AstraZeneca Pharmaceuticals LP | AstraZeneca Pharmaceuticals LP | 1800 Concord Pike PO Box 15437 | Wilmington | Delaware | 19850-5437 | United States |
| Aurobindo Pharma, Ltd. | Aurobindo Pharma, Ltd. | 279 Princeton Hightstown Road | East Windsor | New Jersey | 08520-1401 | United States |
| Aurobindo Pharma, Ltd. | Acrotech BioPharma Inc. | 279 Princeton-Hightstown Road | East Windsor | New Jersey | 08520 | United States |
| Aurobindo Pharma, Ltd. | Aurobindo Pharma USA, Inc. | 279 Princeton Hightstown Road | East Windsor | New Jersey | 08520-1401 | United States |
| Aurobindo Pharma, Ltd. | AuroHealth, LLC | 279 Princeton Hightstown Road | East Windsor | New Jersey | 08520 | United States |
| Aurobindo Pharma, Ltd. | Eugia US LLC | 279 Princeton Hightstown Road | East Windsor | New Jersey | 08520 | United States |
| Aurobindo Pharma, Ltd. | Vespyr Brands Inc. | 279 Princeton Hightstown Road | East Windsor | New Jersey | 08520-1401 | United States |

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|---|---|---|---|---|---|---|
| Avadel CNS Pharmaceuticals, LLC | Avadel CNS Pharmaceuticals, LLC | 16640 Chesterfield Grove Road, Suite 200 | Chesterfield | Missouri | 63005 | United States |
| AVEO Pharmaceuticals, Inc. | AVEO Pharmaceuticals, Inc. | 30 Winter Place | Boston | Massachusetts | 02118 | United States |
| Azurity Pharmaceuticals, Inc. | Azurity Pharmaceuticals, Inc. | 841 Woburn Street | Wilmington | Massachusetts | 01887-3414 | United States |
| B.F. Ascher & Co., Inc. | B.F. Ascher & Co., Inc. | 15501 W. 109th St. | Lenexa | Kansas | 66219 | United States |
| Bausch + Lomb | Bausch + Lomb | 400 Somerset Corporate Blvd. | Bridgewater | New Jersey | 08807 | United States |
| Bausch Health Companies | Bausch Health Companies | 400 Somerset Corporate Boulevard | Bridgewater | New Jersey | 8807 | United States |
| Bausch Health Companies | Salix | 400 Somerset Corporate Blvd | Bridgewater | New Jersey | 08807 | United States |
| Baxter Healthcare Corporation | Baxter Healthcare Corporation | One Baxter Parkway | Deerfield | Illinois | 60015 | United States |
| Bayer HealthCare LLC | Bayer HealthCare LLC | 100 Bayer Boulevard | Whippany | New Jersey | 07981-0915 | United States |
| Bayer HealthCare LLC | Bayer Consumer Care Holdings LLC | 100 Bayer Blvd | Whippany | New Jersey | 07981 | United States |
| Bayer HealthCare LLC | Bayer HealthCare Pharmaceuticals Inc. | 100 Bayer Blvd | Whippany | New Jersey | 07981 | United States |
| Bayer HealthCare LLC | Bayer HealthCare Pharmaceuticals LLC | 800 Dwight Way | Berkeley | California | 94710 | United States |
| BestCo, Inc. | BestCo, Inc. | 288 Mazeppa Road | Mooresville | North Carolina | 28027 | United States |
| Beutlich Pharmaceuticals LLC | Beutlich Pharmaceuticals LLC | 7775 S. US HWY 1, Unit H | Bunnell | Florida | 32110 | United States |
| Biocon Pharma, Inc. | Biocon Pharma, Inc. | 485 Highway 1 South, Suite B305 | Iselin | New Jersey | 08830 | United States |
| Biogen Inc. | Biogen Inc. | 225 Binney Street | Cambridge | Massachusetts | 02142 | United States |
| Biological E Limited | Biological E Limited | Road No. 35, Jubilee Hills | Hyderabad, Telangana | N/A | 500033 | India |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Biological E Limited | BE Pharmaceuticals, Inc. | 203 New Edition Ct. | Cary | North Carolina | 27511 | United States |
| BioMarin Pharmaceutical Inc. | BioMarin Pharmaceutical Inc. | 105 Digital Drive | Novato | California | 94949 | United States |
| Bionpharma Inc. | Bionpharma Inc. | 600 Alexander Road Suite 2-4B | Princeton | New Jersey | 08540 | United States |
| Blistex Inc. | Blistex Inc. | 1800 Swift Drive | Oak Brook | Illinois | 60523 | United States |
| Blueprint Medicines Corporation | Blueprint Medicines Corporation | 45 Sidney St | Cambridge | Massachusetts | 02139 | United States |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim USA, Inc. | 900 Ridgebury Road | Ridgefield | Connecticut | 06877 | United States |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Animal Health Division | 3239 Satellite Blvd | Duluth | Georgia | 30096-4640 | United States |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Animal Health Puerto Rico LLC | P.O. Box 601 | Barceloneta | Puerto Rico | 00617 | United States |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Pharmaceuticals, Inc. | 900 Ridgebury Road | Ridgefield | Connecticut | 06877 | United States |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Vetmedica, Inc. | 2612 Belt Highway | St. Joseph | Missouri | 64506 | United States |
| Bridges | Bridges | 27070 Miles Road, Suite A | Solon | Ohio | 44139 | United States |
| Bridges | Clarion Brands LLC | 27070 Miles Road, Suite A | Solon | Ohio | 44139 | United States |
| Bristol Myers Squibb Company | Bristol Myers Squibb Company | P.O. Box 4500 | Princeton | New Jersey | 08543-4500 | United States |
| Bristol Myers Squibb Company | Bristol Myers Squibb Pharma Company | P.O. Box 4500 | Princeton | New Jersey | 08543-4500 | United States |
| Bristol Myers Squibb Company | Celgene Corporation | 86 Morris Avenue | Summit | New Jersey | 07901 | United States |
| Bristol Myers Squibb Company | E.R. Squibb & Sons, LLC | P.O. Box 4500 | Princeton | New Jersey | 08543-4500 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Bristol Myers Squibb Company | MyoKardia, Inc | 1000 Sierra Point Pkwy | Brisbane | California | 94005 | United States |
| Cameron Pharmaceuticals, LLC | Cameron Pharmaceuticals, LLC | 12305 Westport Rd., Suite 205 | Louisville | Kentucky | 40245 | United States |
| Catalent Pharma Solutions, Inc. | Catalent Pharma Solutions, Inc. | 14 Schoolhouse Road | Somerset | New Jersey | 08873 | United States |
| Catalent Pharma Solutions, Inc. | Catalent Anagni S.r.l. | STRADA PROVINCIALE 12 CASILINA 41, ANAGNI (FONTANA DEL CERASO) | Frosinone | N/A | 03012 | Italy |
| Catalent Pharma Solutions, Inc. | Catalent Argentina S.A.I.C. | Avenida Bernabe Marquez 691, Villa Loma Hermosa | Buenos Aires | N/A | 1657 | Argentina |
| Catalent Pharma Solutions, Inc. | Catalent Belgium S.A. | Font Saint Landry 10 | Brussels | N/A | 1120 | Belgium |
| Catalent Pharma Solutions, Inc. | Catalent CTS (Edinburgh) Limited | 1 Inchwood Park | Bathgate | N/A | EH48 2FY | United Kingdom |
| Catalent Pharma Solutions, Inc. | Catalent CTS, LLC | 10245 Hickman Mills Dr | Kansas City | Missouri | 64137 | United States |
| Catalent Pharma Solutions, Inc. | Catalent France Beinheim S.A. | 74 Rue Principale | Beinheim | N/A | 67930 | France |
| Catalent Pharma Solutions, Inc. | Catalent Germany Eberbach GmbH | Gammelsbacher Strasse 2 | Eberbach, Baden | N/A | 69412 | Germany |
| Catalent Pharma Solutions, Inc. | Catalent Germany Schorndorf GmbH | Steinbeisstrasse 2 | Schorndorf | N/A | D-73614 | Germany |
| Catalent Pharma Solutions, Inc. | Catalent Greenville, Inc. | 1240 Sugg Parkway | Greenville | North Carolina | 27834 | United States |
| Catalent Pharma Solutions, Inc. | Catalent Indiana, LLC | 1300 S Patterson Drive | Bloomington | Indiana | 47403 | United States |
| Catalent Pharma Solutions, Inc. | Catalent Maryland, Inc. | 7555 Harmans Road | Harmans | Maryland | 21077 | United States |
| Catalent Pharma Solutions, Inc. | Catalent Massachusetts, LLC | 190 Everett Avenue | Chelsea | Massachusetts | 02150 | United States |
| Catalent Pharma Solutions, Inc. | Catalent Micron Technologies Limited | Crossways Boulevard, Crossways | Dartford, Kent | N/A | DA2 6QY | United Kingdom |
| Catalent Pharma Solutions, Inc. | Catalent Micron Technologies, Inc. | 333 Phoenixville Pike | Malvern | Pennsylvania | 19355 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Catalent Pharma Solutions, Inc. | Catalent Nottingham Limited | 8 Orchard Place, Nottingham Business Park | Nottingham, Nottinghamshire | N/A | NG8 6PX | United Kingdom |
| Catalent Pharma Solutions, Inc. | Catalent Ontario Limited | 2125 Ambassador Drive | Windsor | Ontario | N9C 3R5 | Canada |
| Catalent Pharma Solutions, Inc. | Catalent Pharma Solutions Limited | Frankland Road, Blagrove | Swindon, Wiltshire | N/A | SN5 8RU | United Kingdom |
| Catalent Pharma Solutions, Inc. | Catalent Pharma Solutions, LLC | 14 Schoolhouse Road | Somerset | New Jersey | 08873 | United States |
| Catalent Pharma Solutions, Inc. | Catalent U.K. Swindon Zydis Limited | Frankland Road, Blagrove | Swindon, Wiltshire | N/A | SN5 8RU | United Kingdom |
| Catalyst Pharmaceuticals, Inc. | Catalyst Pharmaceuticals, Inc. | 355 Alhambra Circle, Suite 801 | Coral Gables | Florida | 33134 | United States |
| Chartwell RX, LLC | Chartwell RX, LLC | 77 Brenner Drive | Congers | New York | 10920 | United States |
| Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.) | Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.) | 175 Regency Woods Suite 600 | Cary | North Carolina | 27518 | United States |
| Church & Dwight Company, Inc. | Church & Dwight Company, Inc. | 469 N Harrison St | Princeton | New Jersey | 08540-3597 | United States |
| Cintex Services, LLC | Cintex Services, LLC | 5400 Laurel Springs Parkway, Suite 803A | Suwanee | Georgia | 30024 | United States |
| CitraGen Pharmaceuticals, Inc. | CitraGen Pharmaceuticals, Inc. | 3789 Spinnaker Court | Fremont | California | 94538 | United States |
| CMP Pharma, Inc | CMP Pharma, Inc | PO Box 147 8026 East Marlboro Rd. | Farmville | North Carolina | 27828 | United States |
| Colgate Oral Pharmaceuticals, Inc. | Colgate Oral Pharmaceuticals, Inc. | 300 Park Avenue | New York | New York | 10022 | United States |
| Collegium Pharmaceutical, Inc. | Collegium Pharmaceutical, Inc. | 100 Technology Center Drive, Suite 300 | Stoughton | Massachusetts | 02072 | United States |
| Collegium Pharmaceutical, Inc. | BioDelivery Sciences, Inc. | 4131 ParkLake Avenue, Suite 225 | Raleigh | North Carolina | 27612 | United States |
| Corcept Therapeutics | Corcept Therapeutics | 149 Commonwealth Drive | Menlo Park | California | 94025 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Corium, Inc. | Corium, Inc. | 11 Farnsworth St., 4th Floor | Boston | Massachusetts | 2210 | United States |
| Cosette Pharmaceuticals, Inc. | Cosette Pharmaceuticals, Inc. | 101 Coolidge St. | South Plainfield | New Jersey | 07080 | United States |
| Covis Pharma GmbH | Covis Pharma GmbH | Baarn, Zug Branch Grafenauweg 12 | Zug | N/A | CH- 6300 | Switzerland |
| Covis Pharma GmbH | AMAG Pharma USA, Inc. | Baarn, Zug Branch Grafenauweg 12 | Zug | N/A | CH- 6300 | Switzerland |
| Covis Pharma GmbH | AMAG Pharmaceuticals, Inc. | Baarn, Zug Branch Grafenauweg 12 | Zug | N/A | CH- 6300 | Switzerland |
| Covis Pharma GmbH | Covis Pharma US, Inc. | 1150 1st Ave. Suite 940 | King of Prussia | Pennsylvania | 19406 | United States |
| Crown Laboratories, Inc. | Crown Laboratories, Inc. | 349 Lafe Cox Drive | Johnson City | Tennessee | 37604 | United States |
| CSL Ltd. | CSL Ltd. | 1020 1st Avenue | King of Prussia | Pennsylvania | 19406 | United States |
| CSL Ltd. | CSL Behring, LLC | 1020 1st Avenue | King of Prussia | Pennsylvania | 19406 | United States |
| CSL Ltd.CTI BioPharma Corp. | Vifor Pharma, Inc. | 100 Cardinal Way3101 Western Avenue, Suite #800 | Redwood CitySeattle | CaliforniaWashington | 94063 | United States |
| Currax Pharmaceuticals LLC dba Cypress, Macoven, Hawthornn | Currax Pharmaceuticals LLC dba Cypress, Macoven, Hawthornn | 155 FRANKLIN ROAD, SUITE 450 | BRENTWOOD | Tennessee | 37027 | United States |
| Daiichi Sankyo, Inc. | Daiichi Sankyo, Inc. | 211 Mt. Airy Rd. | Basking Ridge | New Jersey | 07920 | United States |
| Daiichi Sankyo, Inc. | American Regent, Inc. | One Luitpold Drive | Shirley | New York | 11967 | United States |
| Daiichi Sankyo, Inc. | HBT Labs Inc. | 536 Vanguard Way | Brea | California | 92821 | United States |
| Dechra Veterinary Products North America | Dechra Veterinary Products North America | 7015 College Blvd Ste 525 | Leawood | Kansas | 66211-1551 | United States |
| Deciphera Pharmaceuticals, LLC | Deciphera Pharmaceuticals, LLC | 200 Smith Street Building B 3rd Floor | Waltham | Massachusetts | 02451 | United States |
| DermaRite Industries | DermaRite Industries | 7777 Westside Avenue | North Bergen | New Jersey | 07047 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Dermazone Solutions, Inc. | Dermazone Solutions, Inc. | 2440 30th Avenue North Dermazone Solutions | St. Petersburg | Florida | 33713 | United States |
| Diamond Wipes International, Inc | Diamond Wipes International, Inc | 4651 Schaefer Ave | Chino | California | 91710 | United States |
| DLC Laboratories, Inc. | DLC Laboratories, Inc. | 7008 Marcelle Street | Paramount | California | 90723 | United States |
| DSE Healthcare Solutions, LLC | DSE Healthcare Solutions, LLC | 105 Fieldcrest Avenue Suite 502A | Edison | New Jersey | 08837 | United States |
| DSE Healthcare Solutions, LLC | Numark Brands, Inc. | 105 Fieldcrest Avenue Suite 502A | Edison | New Jersey | 08837 | United States |
| Dukal LLC | Dukal LLC | 2 Fleetwood Court | Ronkonkoma | New York | 11779 | United States |
| e5 Pharma, LLC | e5 Pharma, LLC | 225 Mizner Boulevard Ste 770 | Boca Raton | Florida | 33432 | United States |
| e5 Pharma, LLC | Mizner Bioscience, LLC | 225 ME Mizner Boulevard Suite 760 | Boca Raton | Florida | 33432 | United States |
| Edenbridge Pharmaceuticals, LLC | Edenbridge Pharmaceuticals, LLC | 1 Upper Pond Road Suite D250 | Parsippany | New Jersey | 07054 | United States |
| Eisai, Inc. | Eisai, Inc. | 100 Tice Blvd | Wood Cliff Lake | New Jersey | 07677 | United States |
| Elanco US Inc. | Elanco US Inc. | 2500 Innovation Way N | Greenfield | Indiana | 46140-9163 | United States |
| Eli Lilly and Company | Eli Lilly and Company | Lilly Corporate Center | Indianapolis | Indiana | 46285 | United States |
| Elite Laboratories, Inc | Elite Laboratories, Inc | 165 Ludlow Avenue | Northvale | New Jersey | 07647 | United States |
| EMD Serono, Inc. | EMD Serono, Inc. | One Technology Place | Rockland | Massachusetts | 02370 | United States |
| Emergent Devices Inc. | Emergent Devices Inc. | 401 Plymouth Rd Ste 400 | Plymouth Meeting | Pennsylvania | 19462-1645 | United States |
| Emmaus Medical, Inc. | Emmaus Medical, Inc. | 21250 Hawthorne Blvd., Suite 800 | Torrance | California | 90503 | United States |
| Encube Ethicals, Inc. | Encube Ethicals, Inc. | 200 Meredith Drive, Suite 200 | Durham | North Carolina | 27713 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Endo Pharmaceuticals Inc. | Endo Pharmaceuticals Inc. | 1400 Atwater Drive | Malvern | Pennsylvania | 19355 | United States |
| Endo Pharmaceuticals Inc. | Par Pharmaceutical Companies, Inc. | 6 Ram Ridge Rd | Chestnut Ridge | New York | 10977 | United States |
| Endo Pharmaceuticals Inc. | Par Pharmaceutical, Inc. | 6 Ram Ridge Road | Chestnut Ridge | New York | 10977 | United States |
| Endo Pharmaceuticals Inc. | Par Pharmaceuticals, Inc. (d/b/a Par Pharmaceutical) | 6 Ram Ridge Rd | Chestnut Ridge | New York | 10977 | United States |
| Endo Pharmaceuticals Inc. | Par Sterile Products, LLC (d/b/a Par Pharmaceutical) | 6 Ram Ridge Road | Chestnut Ridge | New York | 10977 | United States |
| Esperion Therapeutics, Inc. | Esperion Therapeutics, Inc. | 3891 Ranchero Drive Suite 150 | Ann Arbor | Michigan | 48108 | United States |
| Eton Pharmaceuticals, Inc. | Eton Pharmaceuticals, Inc. | 21925 W Field Parkway, Suite 235 | Deer Park | Illinois | 60010 | United States |
| Exelixis, Inc. | Exelixis, Inc. | 1851 Harbor Bay Parkway | Alameda | California | 94502 | United States |
| Ferring Pharmaceuticals Inc. | Ferring Pharmaceuticals Inc. | 100 Interpace Parkway | Parsippany | New Jersey | 7054 | United States |
| Forte Bio-Pharma LLC | Forte Bio-Pharma LLC | 8311 W. Sunset Rd. #150 | Las Vegas | Nevada | 89113 | United States |
| Forte Bio-Pharma LLC | FH2 Pharma LLC | 9205 W. Russell Rd Ste 240 | Las Vegas | Nevada | 89148 | United States |
| Forte Bio-Pharma LLC | Intra-Sana Laboratories | 7455 Arroyo Crossing Ste 220 | Las Vegas | Nevada | 89113 | United States |
| Foundation Consumer Healthcare, LLC | Foundation Consumer Healthcare, LLC | 106 Isabella Street Suite 602 | Pittsburgh | Pennsylvania | 15212 | United States |
| Foundation Consumer Healthcare, LLC | Foundation Consumer Brands, LLC | 106 Isabella Street Suite 602 | Pittsburgh | Pennsylvania | 15212 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Fourstar Group USA, Inc. | Fourstar Group USA, Inc. | 189 Main Street Suite 31 | Milford | Massachusetts | 01757 | United States |
| Fresenius Kabi USA, LLC | Fresenius Kabi USA, LLC | Three Corporate Drive | Lake Zurich | Illinois | 60047 | United States |
| Galderma Laboratories, L.P. | Galderma Laboratories, L.P. | 14501 North Freeway | Fort Worth | Texas | 76177 | United States |
| Garcoa Laboratories, Inc. | Garcoa Laboratories, Inc. | 26135 Mureau Road | Calabasas | California | 91302 | United States |
| GenBioPro, Inc. | GenBioPro, Inc. | 3651 Lindell Rd., P.O. Box 32011 | Las Vegas | Nevada | 89103 | United States |
| Genus Lifesciences Inc. | Genus Lifesciences Inc. | 514 North 12th Street | Allentown | Pennsylvania | 18102 | United States |
| Gilead Sciences, Inc. | Gilead Sciences, Inc. | 333 Lakeside Drive | Foster City | California | 94404 | United States |
| Gilead Sciences, Inc. | Asegua Therapeutics LLC | 333 Lakeside Drive | Foster City | California | 94404 | United States |
| Gilead Sciences, Inc. | Gilead Sciences, LLC | 333 Lakeside Drive | Foster City | California | 94404 | United States |
| GlaxoSmithKline, LLC | GlaxoSmithKline, LLC | 2929 Walnut Street, Suite 1700 | Philadelphia | Pennsylvania | 19104 | United States |
| GlaxoSmithKline, LLC | ViiV Healthcare Company | 5 Moore Drive | RTP | North Carolina | 27709 | United States |
| Granard Pharmaceuticals | Granard Pharmaceuticals | 1967 Highway 34 | Wall | New Jersey | 07719 | United States |
| Granard Pharmaceuticals | Royal Pharmaceuticals | 1967 Highway 34 | Wall | New Jersey | 07719 | United States |
| Granard Pharmaceuticals | Seton Pharmaceuticals, LLC | 1967 Highway 34 Suite 103 | Wall | New Jersey | 07719 | United States |
| Gregory Pharmaceutical Holdings | Gregory Pharmaceutical Holdings | 501 Fifth Street | Bristol | Tennessee | 37620 | United States |
| Grifols Shared Services North America Inc. | Grifols Shared Services North America Inc. | 2410 Grifols Way | Los Angeles | California | 90032 | United States |
| Grifols Shared Services North America Inc. | Grifols Biologicals LLC | 5555 Valley Blvd. | Los Angeles | California | 90032 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Grifols Shared Services North America Inc. | Grifols Therapeutics LLC | 8368 US 70 Business Hwy West | Clayton | North Carolina | 27520 | United States |
| Grifols Shared Services North America Inc. | Instituto Grifols S.A. | Poligono Industrial Levante C Can Guasc, 2 | Parets Del Valles | N/A | 08150 | Spain |
| Grifols Shared Services North America Inc. | Laboratorios Grifols S.A. | Calle Logistica 2 Poligono Industrial Z | Parets del Valles | N/A | 08150 | Spain |
| Guardian Drug Company | Guardian Drug Company | 2 Charles Court | Dayton | New Jersey | 08810 | United States |
| H2-Pharma, LLC | H2-Pharma, LLC | 2021 Berry Chase Place | Montogomery | Alabama | 36117 | United States |
| Haleon | Haleon | 184 Liberty Corner Road Suite 200 | Warren | New Jersey | 7059 | United States |
| Harmony Biosciences, LLC | Harmony Biosciences, LLC | 630 W. Germantown Pike, Suite 215 | Plymouth Meeting | Pennsylvania | 19462 | United States |
| Helsinn Therapeutics (US), Inc | Helsinn Therapeutics (US), Inc | 170 Wood Ave South | Iselin | New Jersey | 08830 | United States |
| Henry Schein, Inc | Henry Schein, Inc | 135 Duryea Rd, E-355 | MELVILLE | New York | 11747 | United States |
| HLS Therapeutics (USA), Inc. | HLS Therapeutics (USA), Inc. | 919 Conestoga Road, Building Three Suite 310 | Rosemont | Pennsylvania | 19010 | United States |
| Horizon Therapeutics plc. | Horizon Therapeutics plc. | 1 Horizon Way | Deerfield | Illinois | 60015 | United States |
| Horizon Therapeutics plc. | Horizon Medicines LLC | 1 Horizon Way | Deerfield | Illinois | 60015 | United States |
| Horizon Therapeutics plc. | Horizon Therapeutics USA, Inc. | 1 Horizon Way | Deerfield | Illinois | 60015 | United States |
| i-Health, Inc. | i-Health, Inc. | 55 Sebethe Dr. | Cromwell | Connecticut | 06416 | United States |
| Idorsia Pharmaceuticals US Inc. | Idorsia Pharmaceuticals US Inc. | One Radnor Corporate Center, Suite 101 100 Matsonford Rd. | Radnor | Pennsylvania | 19087 | United States |
| Incyte Corporation | Incyte Corporation | 1801 Augustine Cut-Off | Wilmington | Delaware | 19803 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Indivior Inc | Indivior Inc | 10710 Midlothian Turnpike Suite 125 | Richmond | Virginia | 23235 | United States |
| Infirst Healthcare Inc | Infirst Healthcare Inc | 8 Church Lane | Westport | Connecticut | 06880 | United States |
| Ingenus Pharmaceuticals, LLC | Ingenus Pharmaceuticals, LLC | 4901 Vineland Road Suite 260 | Orlando | Florida | 32811 | United States |
| Insmed Incorporated | Insmed Incorporated | 700 US Highway 202 / 206 | Bridgewater | New Jersey | 08807 | United States |
| Ipsen Biopharmaceuticals, Inc | Ipsen Biopharmaceuticals, Inc | One Main St 7th Floor | Cambridge | Massachusetts | 02142 | United States |
| Ironshore Pharmaceuticals Inc | Ironshore Pharmaceuticals Inc | 430 Davis Drive, Suite 250 | Morrisville | North Carolina | 27560 | United States |
| J.R. Watkins LLC | J.R. Watkins LLC | 1111 Broadway | Oakland | California | 94607 | United States |
| James Alexander Corporation | James Alexander Corporation | 845 Route 94 | Frelinghuysen | New Jersey | 07825 | United States |
| Jazz Pharmaceuticals, Inc. | Jazz Pharmaceuticals, Inc. | 3170 Porter Drive | Palo Alto | California | 94304 | United States |
| Johnson & Johnson | Johnson & Johnson | 410 George Street | New Brunswick | New Jersey | 8901 | United States |
| Johnson & Johnson | Actelion | 5000 Shoreline Ct STE 200 | South San Francisco | California | 94080 | United States |
| Johnson & Johnson | CoTherix | 1125 Trenton-Harbourton Road, | Titusville | New Jersey | 08560 | United States |
| Johnson & Johnson | Ethicon, Inc. | 410 George Street | New Brunswick | New Jersey | 8901 | United States |
| Johnson & Johnson | Janssen Biotech, Inc. | 800/850 Ridgeview Drive | Horsham | Pennsylvania | 19044 | United States |
| Johnson & Johnson | Janssen Pharmaceuticals, Inc. | 1125 Trenton-Harbourton Road | Titusville | New Jersey | 08560 | United States |
| Johnson & Johnson | Janssen Products, LP | 1000 US-2020 | Raritan | New Jersey | 08869 | United States |
| Johnson & Johnson | Patriot Pharmaceuticals, LLC | 200 Tournament Drive | Horsham | Pennsylvania | 19044 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Johnson & Johnson Consumer, Inc. | Johnson & Johnson Consumer, Inc. | 199 Grandview Road | Skillman | New Jersey | 08558 | United States |
| Kaleo Inc. | Kaleo Inc. | 111 Virginia Street Suite 300 | Richmond | Virginia | 23219 | United States |
| Karyopharm Therapeutics, Inc. | Karyopharm Therapeutics, Inc. | 85 Wells Avenue, Suite 210 | Newton | Massachusetts | 02459 | United States |
| Kobayashi Healthcare International, Inc. | Kobayashi Healthcare International, Inc. | 245 Kraft Drive | Dalton | Georgia | 30721 | United States |
| Kobayashi Healthcare International, Inc. | Alva-Amco Pharmacal Companies, Inc. | 7711 N Merrimac Avenue | Niles | Illinois | 60714-3423 | United States |
| Kowa Pharmaceuticals America, Inc. | Kowa Pharmaceuticals America, Inc. | 530 Industrial Park Blvd. | Montgomery | Alabama | 36117 | United States |
| Kt Health, LLC | Kt Health, LLC | 584 East 1100 South 4 | American Fork | Utah | 84003 | United States |
| Kyowa Kirin, Inc. | Kyowa Kirin, Inc. | 510 Carnegie Center Drive, Suite 600 | Princeton | New Jersey | 8540 | United States |
| Laurus Generics Inc. | Laurus Generics Inc. | 400 Connell Drive, Suite 5200 | Berkeley Heights | New Jersey | 07922 | United States |
| Leadiant Biosciences, Inc. | Leadiant Biosciences, Inc. | 530 Gaither Road Suite 300 | Rockville | Maryland | 20850 | United States |
| LEO Pharma A/S | LEO Pharma A/S | 7 Giralda Farms 2nd Floor | Madison | New Jersey | 07940 | United States |
| LEO Pharma A/S | LEO Pharma Inc. | 7 Giralda Farms 2nd Floor | Madison | New Jersey | 07940 | United States |
| Lexicon Pharmaceuticals, Inc. | Lexicon Pharmaceuticals, Inc. | 2445 Technology Forest Blvd. 11th Floor | The Woodlands | Texas | 77381 | United States |
| LIFESTAR PHARMA LLC | LIFESTAR PHARMA LLC | 1200 MACARTHUR BOULEVARD | MAHWAH | New Jersey | 07430 | United States |
| Lundbeck Pharmaceuticals LLC | Lundbeck Pharmaceuticals LLC | Six Parkway N Ste 400 | Deerfield | Illinois | 60015 | United States |
| Lupin Pharmaceuticals, Inc. (LPI) | Lupin Pharmaceuticals, Inc. (LPI) | 111 S. Calvert St. | Baltimore | Maryland | 21202 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Mallinckrodt PLC | Mallinckrodt PLC | College Business & Technology Park Cruiserath | Blanchardstown | Dublin | 15 | Ireland |
| Mallinckrodt PLC | Mallinckrodt ARD LLC | 675 McDonnell Blvd. | Hazelwood | Missouri | 63042 | United States |
| Mallinckrodt PLC | SpecGx LLC | 385 Marshall Ave. | Webster Groves | Missouri | 63119 | United States |
| Mayne Pharma Commercial LLC | Mayne Pharma Commercial LLC | 3310 Benson Dr. Suite 401 | Raleigh | North Carolina | 27609 | United States |
| McKesson Corporation | McKesson Corporation | 6555 State Highway 161 | Irving | Texas | 75039 | United States |
| McKesson Corporation | McKesson Medical-Surgical, Inc. | 9954 Maryland Dr. Suite 4000 | Richmond | Virginia | 23228 | United States |
| McKesson Corporation | Northstar Rx, LLC | 4835 Crumpler Road | Memphis | Tennessee | 38141-8300 | United States |
| Medefil, Inc | Medefil, Inc | 250 Windy Point Drive | Glendale Heights | Illinois | 60139 | United States |
| Medexus Pharma, Inc. | Medexus Pharma, Inc. | 29 N. Wacker Drive, Suite 704 | Chicago | Illinois | 60606 | United States |
| Medimetriks Pharmaceuticals, Inc. | Medimetriks Pharmaceuticals, Inc. | 383 Route 46 West | Fairfield | New Jersey | 07004 | United States |
| Meiyume | Meiyume | 1359 Broadway 17th Floor | New York | New York | 10018 | United States |
| Meiyume | Lornamead Inc. | 175 Cooper Avenue | Tonawanda | New York | 14150 | United States |
| Melinta Therapeutics LLC | Melinta Therapeutics LLC | 300 TriState International, Suite 272 | Lincolnshire | Illinois | 60069 | United States |
| Merck & Co., Inc. | Merck & Co., Inc. | 126 East Lincoln Ave | Rahway | New Jersey | 07065 | United States |
| Merck & Co., Inc. | Intervet, Inc., doing business as Merck Animal Health | 2 Giralda Farms | Madison | New Jersey | 07940 | United States |
| Merck & Co., Inc. | Merck Sharp & Dohme LLC | 126 East Lincoln Ave. P.O. Box 2000 | Rahway | New Jersey | 07065 | United States |
| Merz Pharmaceuticals, LLC | Merz Pharmaceuticals, LLC | 6601 Six Forks Road, Suite 430 | Raleigh | North Carolina | 27615 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Mikart, LLC | Mikart, LLC | 1750 Chatahoochee Ave NW | Atlanta | Georgia | 30318 | United States |
| Mission Pharmacal Company | Mission Pharmacal Company | P.O. Box 786099 | San Antonio | Texas | 78278-6099 | United States |
| Mission Pharmacal Company | BioComp Pharma, Inc. | P.O. Box 786099 | San Antonio | Texas | 78278-6099 | United States |
| Mitsubishi Tanabe Pharma America | Mitsubishi Tanabe Pharma America | 525 Washington Blvd Ste 1100 | Jersey City | New Jersey | 07310 | United States |
| Mylan Inc. | Mylan Inc. | 1000 Mylan Boulevard | Canonsburg | Pennsylvania | 15317 | United States |
| Mylan Inc. | Alaven Pharmaceuticals LLC | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Alphapharm Pty Ltd | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | DPT Laboratories LTD (DD) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | DPT Laboratories LTD (JS) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Greenstone LLC | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Meda Pharmaceuticals, Inc. | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Institutional Galway | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Institutional Inc. (IL) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Institutional Inc. (TX) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Institutional LLC | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (1606-1609JP) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (20/21JP) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (BL) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Mylan Inc. | Mylan Laboratories Limited (F4/F12OSD) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (H12/H13OSD) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (OTL) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (SF) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (SFF) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Laboratories Limited (SPD) | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Pharmaceuticals, Inc. | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Specialty L.P. | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Mylan Technologies, Inc. | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Pfizer Pharmaceuticals LLC (Barceloneta) | 3711 Collins Ferry Road, Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Pfizer Pharmaceuticals LLC (Vega Baja) | 3711 Collins Ferry Road, Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Viatris Specialty LLC | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Mylan Inc. | Wallace Pharmaceuticals, Inc. | 3711 Collins Ferry Road Reg Affs | Morgantown | West Virginia | 26505 | United States |
| Natural Essentials Inc | Natural Essentials Inc | 115 Lena Drive | Aurora | Ohio | 44202 | United States |
| Neos Therapeutics, Inc. | Neos Therapeutics, Inc. | 2940 N State Highway 360 Ste 400 | Grand Prairie | Texas | 75050-6424 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Neos Therapeutics, Inc. | Neos Therapeutics Brands LLC | 2940 N. State Highway 360 Suite 400 | Grand Prairie | Texas | 75050 | United States |
| Neos Therapeutics, Inc. | Neos Therapeutics LP | 2940 N State Highway 360 Ste 400 | Grand Prairie | Texas | 75050-6424 | United States |
| Nephron Pharmaceuticals Corporation | Nephron Pharmaceuticals Corporation | 4500 12th Street Ext | West Columbia | South Carolina | 29172-3025 | United States |
| Neurocrine Biosciences, Inc. | Neurocrine Biosciences, Inc. | 12780 El Camino Real | San Diego | California | 92130 | United States |
| Norbrook Laboratories Limited | Norbrook Laboratories Limited | Carnbane Industrial Estate | Newry, County Down | N/A | BT35 6QQ | United Kingdom |
| Norbrook Laboratories Limited | Norbrook, Inc. | 9733 Loiret Blvd | Lenexa | Kansas | 66219 | United States |
| Nostrum Laboratories, Inc. | Nostrum Laboratories, Inc. | 705 East Mulberry Street | Bryan | Ohio | 43506 | United States |
| Novartis Group Companies | Novartis Group Companies | 59 Route 10 | East Hanover | New Jersey | 07936 | United States |
| Novartis Group Companies | Novartis Pharmaceuticals Corporation | 1 Health Plaza | East Hanover | New Jersey | 07936-1016 | United States |
| Novo Nordisk Inc. | Novo Nordisk Inc. | 800 Scudders Mill Road | Plainsboro | New Jersey | 08536 | United States |
| Novo Nordisk Inc. | Novo Nordisk Pharma Inc | 800 Scudders Mill Rd | Plainsboro | New Jersey | 08536-1606 | United States |
| NS Pharma, Inc. | NS Pharma, Inc. | 140 East Ridgewood Avenue Suite 280S | Paramus | New Jersey | 7652 | United States |
| OCuSOFT Inc. | OCuSOFT Inc. | 30444 SW FWY Building B | Rosenberg | Texas | 77471 | United States |
| Oliva Therapeutics, LLC | Oliva Therapeutics, LLC | 45 N Broad St, Ste 504 | Ridgewood | New Jersey | 7450 | United States |
| Optinose US, Inc. | Optinose US, Inc. | 1020 Stony Hill Road Suite 300 | Yardley | Pennsylvania | 19067 | United States |
| OrchidPharma, Inc. | OrchidPharma, Inc. | 4 Independence Way Ste 125 | Princeton | New Jersey | 08540 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| OrchidPharma, Inc. | Orchid Pharma Ltd. | 313 Valluvar Kottam High Rd | Nungambakkam | Tamil Nadu | 600 034 | India |
| Orexo US, Inc. | Orexo US, Inc. | 150 Headquarters Plaza | Morristown | New Jersey | 07960 | United States |
| Organon LLC | Organon LLC | 30 Hudson Street | Jersey City | New Jersey | 07301 | United States |
| Orion Corporation | Orion Corporation | Orionintie 1 | Espoo | N/A | 02200 | Finland |
| Otsuka America Pharmaceutical, Inc. | Otsuka America Pharmaceutical, Inc. | 508 Carnegie Center | Princeton | New Jersey | 08540 | United States |
| Padagis US LLC | Padagis US LLC | 1251 Lincoln Road | Allegan | Michigan | 49010 | United States |
| PARI Respiratory Equipment, Inc. | PARI Respiratory Equipment, Inc. | 2412 Pari Way | Midlothian | Virginia | 23112 | United States |
| PARI Respiratory Equipment, Inc. | Genericus, Inc. | 4860 Cox Road Suite 200 | Glen Allen | Virginia | 23060 | United States |
| Pegasus Laboratories, Inc. | Pegasus Laboratories, Inc. | 8809 Ely Road | Pensacola | Florida | 32514 | United States |
| Perrigo Company | Perrigo Company | 515 Eastern Avenue | Allegan | Michigan | 49010 | United States |
| Perrigo Company | HRA Pharma America | 36 Cattano Ave Suite 400 | Morristown | New Jersey | 07960 | United States |
| Perrigo Company | L. Perrigo Company | 515 Eastern Avenue | Allegan | Michigan | 49010 | United States |
| Perrigo Company | Perrigo Direct Inc. | 725 Highway 74 S | Peachtree | Georgia | 30269 | United States |
| Perrigo Company | Perrigo New York, Inc. | 1625 Bathgate Avenue | Bronx | New York | 10457 | United States |
| Perrigo Company | PMI Branded Pharmaceuticals, Inc. | 515 Eastern Avenue | Allegan | Michigan | 49010 | United States |
| Petros Pharmaceuticals, Inc. | Petros Pharmaceuticals, Inc. | 1185 Avenue of the Americas Suite 249 | New York City | New York | 10036 | United States |
| Petros Pharmaceuticals, Inc. | Metuchen Pharmaceuticals, LLC | 200 US Highway 9 Suite 500 | Manalapan Township | New Jersey | 07726 | United States |
| Pfizer Inc. | Pfizer Inc. | 66 Hudson Boulevard East | New York | New York | 10001 | United States |
| Pfizer Inc. | Agouron Pharmaceuticals, LLC | 10646 Science Center Drive | San Diego | California | 92121 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Pfizer Inc. | Array Biopharma Inc. | 3200 Walnut Street | Boulder | Colorado | 80301 | United States |
| Pfizer Inc. | Global Blood Therapeutics Inc | 180 Oyster Point Blvd | South San Francisco | California | 94080 | United States |
| Pfizer Inc. | Hospira | 275 N. Fields Drive | Lake Forest | Illinois | 60045 | United States |
| Pfizer Inc. | Pharmacia & Upjohn Company LLC | 7000 Portage Road | Kalamazoo | Michigan | 49001 | United States |
| Pfizer Inc. | Wyeth Holdings LLC | 66 Hudson Boulevard East | New York | New York | 10001 | United States |
| Pfizer Inc. | Wyeth Pharmaceuticals LLC | 500 Arcola Road | Collegeville | Pennsylvania | 19426 | United States |
| Pharma Nobis | Pharma Nobis | 7400 Alumax Rd. | Texarkana | Texas | 75501 | United States |
| Pharmaceutical Associates, Inc. | Pharmaceutical Associates, Inc. | 1700 Perimeter Road | Greenville | South Carolina | 29605 | United States |
| Pharmasphere, Inc. | Pharmasphere, Inc. | 120 Route 17 North | Paramus | New Jersey | 07652 | United States |
| Pharmasphere, Inc. | US Vet, Inc. | 120 Route 17 North | Paramus | New Jersey | 07652 | United States |
| Pharmasphere, Inc. | WG Critical Care LLC | 120 Route 17 North | Paramus | New Jersey | 07652 | United States |
| Pharming Healthcare Inc. | Pharming Healthcare Inc. | 10 Independence Blvd. 4th Floor | Warren | New Jersey | 07059 | United States |
| Preferred Pharmaceuticals Inc | Preferred Pharmaceuticals Inc | 1250 North Lakeview Ave Unit O | Anaheim | California | 92807 | United States |
| Premier Dental Products Company | Premier Dental Products Company | 1710 ROMANO DR. -- | Plymouth Meeting | Pennsylvania | 19462 | United States |
| Prestige Consumer Healthcare, Inc. | Prestige Consumer Healthcare, Inc. | 660 White Plains Road,2nd Floor | Tarrytown | New York | 10591 | United States |
| Prestige Consumer Healthcare, Inc. | C.B. Fleet Company, Incorporated | 660 White Plains Road,2nd Floor | Tarrytown | New York | 10591 | United States |
| Prestige Consumer Healthcare, Inc. | DenTek Oral Care, Inc. | 660 White Plains Road,2nd Floor | Tarrytown | New York | 10591 | United States |
| Prestige Consumer Healthcare, Inc. | Insight Pharmaceuticals LLC | 660 White Plains Road,2nd Floor | Tarrytown | New York | 10591 | United States |
| Prestige Consumer Healthcare, Inc. | Medtech Products Inc. | 660 White Plains Road, 2nd Floor | Tarrytown | New York | 10591 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Primus Pharmaceuticals, Inc. | Primus Pharmaceuticals, Inc. | 7373 N Scottsdale Rd. B-200 | Scottsdale | Arizona | 85253 | United States |
| Professional Disposables International Inc. | Professional Disposables International Inc. | 400 Chestnut Ridge Rd | Woodcliff Lake | New Jersey | 07677 | United States |
| Provell Pharmaceuticals, LLC | Provell Pharmaceuticals, LLC | 1801 Horseshoe Pike - Suite 1 | Honey Brook | Pennsylvania | 19344 | United States |
| Puma Biotechnology | Puma Biotechnology | 10880 Wilshire Boulevard Suite 2150 | Los Angeles | California | 90024 | United States |
| Purdue Pharma L.P. | Purdue Pharma L.P. | One Stamford Forum | Stamford | Connecticut | 06901 | United States |
| Purdue Pharma L.P. | Adlon Therapeutics, LP | One Stamford Forum | Stamford | Connecticut | 06901 | United States |
| Purdue Pharma L.P. | Purdue Pharmaceuticals L.P. | 4701 Purdue Drive | Wilson | North Carolina | 27893 | United States |
| Purdue Pharma L.P. | Rhodes Pharmaceuticals L.P. | 498 Washington Street | Coventry | Rhode Island | 02816 | United States |
| QOL Medical, LLC | QOL Medical, LLC | 3405 Ocean Drive | Vero Beach | Florida | 32963 | United States |
| RB Health (US) LLC | RB Health (US) LLC | 399 Interpace Parkway | Parsippany | New Jersey | 07054 | United States |
| Recordati Rare Diseases, Inc. | Recordati Rare Diseases, Inc. | 440 Route 22 East | Bridgewater | New Jersey | 08807 | United States |
| Regeneron Pharmaceuticals, Inc | Regeneron Pharmaceuticals, Inc | 777 Old Saw Mill River Rd | Tarrytown | New York | 10591 | United States |
| Regeneron Pharmaceuticals, Inc | Regeneron Healthcare Solutions, Inc | 745 Old Saw Mill River Rd | Tarrytown | New York | 10591 | United States |
| Regeneron Pharmaceuticals, Inc | Regeneron Ireland DAC | Raheen Business Park | Limerick | N/A | V94 | Ireland |
| Rhythm Pharmaceuticals, Inc. | Rhythm Pharmaceuticals, Inc. | 222 Berkeley Street 12th Floor | Boston | Massachusetts | 02116 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Rivopharm SA | Rivopharm SA | Centro Insema | Manno | N/A | 6928 | Switzerland |
| Roche Holdings | Roche Holdings | 9115 Hague Road | Indianapolis | Indiana | 46250 | United States |
| Roche Holdings | Genentech, Inc. | Hoffman-La Roche Inc. 1 DNA Way | South San Francisco | California | 94080-4990 | United States |
| RVL Pharmaceuticals, Inc. | RVL Pharmaceuticals, Inc. | 400 Crossing Blvd | Bridgewater | New Jersey | 08807 | United States |
| Safecor Health, LLC | Safecor Health, LLC | 4060 BUSINESS PARK DRIVE | COLUMBUS | Ohio | 43204 | United States |
| Sagent Pharmaceuticals | Sagent Pharmaceuticals | 1901 N. Roselle Road Suite 450 | Schaumburg | Illinois | 60195 | United States |
| Sandoz Inc. | Sandoz Inc. | 100 College Road West | Princeton | New Jersey | 08540 | United States |
| Sandoz Inc. | Eon Labs, Inc. | 60 Baylis Road | Melville | New York | 11747 | United States |
| Sandoz Inc. | Fougera Pharmaceuticals Inc. | 4700 Sandoz Drive | Wilson | North Carolina | 27893 | United States |
| Sanofi-Aventis US LLC. | Sanofi-Aventis US LLC. | 55 Corporate Drive | Bridgewater | New Jersey | 08807 | United States |
| Sanofi-Aventis US LLC. | Chattem, Inc. | 1715 West 38th St. | Chattanooga | Tennessee | 37409 | United States |
| Sanofi-Aventis US LLC. | Genzyme Corporation | 450 Water Street | Cambridge | Massachusetts | 02141 | United States |
| Sanofi-Aventis US LLC. | Kadmon Holdings | 450 East 29th Street | New York | New York | 10016 | United States |
| Scilex Holding Company | Scilex Holding Company | 960 San Antonio Road, Suite 100 | Palo Alto | California | 94303 | United States |
| Scilex Holding Company | Scilex Pharmaceuticals Inc. | 960 San Antonio Road, Suite 100 | Palo Alto | California | 94303 | United States |
| Seagen | Seagen | 21823 30th Drive Southeast | Bothell | Washington | 98021 | United States |
| Secura Bio | Secura Bio | 1995 Village Center Circle, Suite 128 | Las Vegas | Nevada | 89134 | United States |
| Shionogi Inc. | Shionogi Inc. | 400 Campus Dr. | Florham Park | New Jersey | 07932 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| SigmaPharm Laboratories LLC | SigmaPharm Laboratories LLC | 3375 Progress Drive | Bensalem | Pennsylvania | 19020 | United States |
| SK Life Sciences Inc. | SK Life Sciences Inc. | 461 From Road, 5th FL | Paramus | New Jersey | 7652 | United States |
| Slate Run Pharmaceuticals, LLC | Slate Run Pharmaceuticals, LLC | 277 W Nationwide Blvd., Suite 260 | Columbus | Ohio | 43215 | United States |
| Smith & Nephew, Inc. (Smith & Nephew Biotherapeutics) | Smith & Nephew, Inc. (Smith & Nephew Biotherapeutics) | 5600 Clearfork Main St. Suite 600 | Ft. Worth | Texas | 76107 | United States |
| Societal CDMO, Inc. | Societal CDMO, Inc. | 1 East Uwchlan Avenue Suite 112 | Exton | Pennsylvania | 19341-1282 | United States |
| Societal CDMO, Inc. | Societal CDMO Gainesville, LLC | 1300 Gould Drive | Gainesville | Georgia | 30504 | United States |
| Societal CDMO, Inc. | Societal CDMO San Diego, LLC | 6828 Nancy Ridge Drive, Suite 100 | San Diego | California | 92121 | United States |
| Sprout Pharmaceuticals | Sprout Pharmaceuticals | 4350 Lassiter at North Hills Ave #260 | Raleigh | North Carolina | 27609 | United States |
| Stallergenes Greer | Stallergenes Greer | 639 Nuway Circle NE | Lenoir | North Carolina | 28645 | United States |
| Stallergenes Greer | Stallergenes Greer | 639 Nuway Circle NE | Lenoir | North Carolina | 28645 | United States |
| Stemline Therapeutics Inc. | Stemline Therapeutics Inc. | 750 Lexington Avenue, 4th floor | New York | New York | 10022 | United States |
| Supernus Pharmaceuticals, Inc. | Supernus Pharmaceuticals, Inc. | 9715 Key West Avenue | Rockville | Maryland | 20850 | United States |
| Swedish Orphan Biovitrum AB (Sobi AB) | Swedish Orphan Biovitrum AB (Sobi AB) | SE-112 76 | Stockholm | N/A | 02451 | Sweden |
| Swedish Orphan Biovitrum AB (Sobi AB) | AkaRx, Inc. | 240 Leigh Farm Rd Suite 245 | Durham | North Carolina | 27707 | United States |
| Swedish Orphan Biovitrum AB (Sobi AB) | CTI BioPharma Corp. | 3101 Western Avenue, Suite #800 | Seattle | Washington | 98121 | United States |
| Swedish Orphan Biovitrum AB (Sobi AB) | Sobi Inc | 77 4th Avenue 3rd Floor | Waltham | Massachusetts | 02451 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Taiho Oncology, Inc. | Taiho Oncology, Inc. | 101 Carnegie Center, Suite 101 | Princeton | New Jersey | 08540 | United States |
| Takeda Pharmaceuticals America, Inc. | Takeda Pharmaceuticals America, Inc. | 95 Hayden Avenue | Lexington | Massachusetts | 02421 | United States |
| Takeda Pharmaceuticals America, Inc. | Baxalta Incorporated | 95 Hayden Ave. | Lexington | Massachusetts | 02421 | United States |
| Takeda Pharmaceuticals America, Inc. | Dyax Corp | 95 Hayden Ave. | Lexington | Massachusetts | 02421 | United States |
| Takeda Pharmaceuticals America, Inc. | Millennium Pharmaceuticals, Inc. (d/b/a Takeda Oncology) | 40 Lansdowne Street | Cambridge | Massachusetts | 02139 | United States |
| Tec Laboratories, Inc. | Tec Laboratories, Inc. | 7100 Tec Labs Way SW | Albany | Oregon | 97321 | United States |
| TerSera Therapeutics LLC | TerSera Therapeutics LLC | 520 Lake Cook Road, Suite 500 | Deerfield | Illinois | 60015 | United States |
| Teva Pharmaceuticals USA, Inc. | Teva Pharmaceuticals USA, Inc. | 1090 Horsham Rd | North Wales | Pennsylvania | 19454-1505 | United States |
| Teva Pharmaceuticals USA, Inc. | Actavis Generics | 400 Interpace Pkwy | Parsippany | New Jersey | 07054 | United States |
| Teva Pharmaceuticals USA, Inc. | Cephalon, Inc. | Morris Corporate Center III 400 Interpace Pkwy | Parsippany | New Jersey | 07054 | United States |
| Teva Pharmaceuticals USA, Inc. | Teva Neuroscience Inc. | 11100 Nail Ave | Overland Park | Kansas | 66221 | United States |
| The Hain Celestial Group, Inc. | The Hain Celestial Group, Inc. | 4600 Sleepytime Drive | Boulder | Colorado | 80301 | United States |
| The Mentholatum Company | The Mentholatum Company | 707 Sterling Drive | Orchard Park | New York | 14127 | United States |
| The Mentholatum Company | Mentholatum (China) Pharmaceuticals Co., Ltd. | The Second Industrial Estates | Sanxiang, Zhongshan | Guangdong | 528463 | China |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| The Mentholatum Company | Rohto Pharmaceutical Co. Ltd. | 7-3 Yumegaoka, lge | Mie | N/A | 518-0131 | Japan |
| The Procter & Gamble Company | The Procter & Gamble Company | 1 Procter & Gamble Plaza | Cincinnati | Ohio | 45202 | United States |
| The Ritedose Corporation (TRC) | The Ritedose Corporation (TRC) | 1 Technology Circle | Columbia | South Carolina | 29203 | United States |
| The Ritedose Corporation (TRC) | Ritedose Pharmaceuticals, LLC | 1135 Performance Parkway | Columbia | South Carolina | 29203 | United States |
| Thea Pharma Inc | Thea Pharma Inc | 303 Wyman Street Ste 205 | Waltham | Massachusetts | 2451 | United States |
| TOLMAR, Inc. | TOLMAR, Inc. | 701 Centre Avenue | Fort Collins | Colorado | 80526 | United States |
| Torrent Pharma Inc. | Torrent Pharma Inc. | 106 Allen Road Suite 305 | Basking Ridge | New Jersey | 7920 | United States |
| Torrent Pharma Inc. | Torrent Pharmaceuticals Limited | Ahmedabab-mehsana Highway Indrad Taluka-Kadi | Indrad | Gujarat | 382721 | India |
| Torrent Pharma Inc. | Torrent Pharmaceuticals Limited | Plot No. Z/104 to 106, Dahej SEZ Part-II Taluka Vagra, Dist. Bharuch | Bharuch | Gujarat | 392130 | India |
| Tower Laboratories LTD. | Tower Laboratories LTD. | 8 Industrial Park Road | Centerbrook | Connecticut | 06409 | United States |
| Travere Therapeutics, Inc. | Travere Therapeutics, Inc. | 3661 Valley Centre Dr. Suite 300 | San Diego | California | 92130 | United States |
| Tris Pharma, Inc. | Tris Pharma, Inc. | 2033 Route 130 | Monmouth Junction | New Jersey | 08852 | United States |
| Tris Pharma, Inc. | NextWave Pharmaceuticals | 2033 Route 130 | Monmouth Junction | New Jersey | 08852 | United States |
| UCB Inc. | UCB Inc. | 1950 Lake Park Drive | Smyrna | Georgia | 30080 | United States |
| Ultragenyx Pharmaceutical, Inc. | Ultragenyx Pharmaceutical, Inc. | 60 Leveroni Ct | Novato | California | 94949 | United States |
| UniFirst Corporation | UniFirst Corporation | 3499 Rider Trail South | Earth City | Missouri | 63045 | United States |
| UniFirst Corporation | Medique Products | 17080 Alico Commerce Court suite 2 | Fort Myers | Florida | 33967 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| UniFirst Corporation | Prestige Packaging | 17080 Alico Commerce Court suite 4 | Fort Myers | Florida | 33967 | United States |
| United Therapeutics Corporation | United Therapeutics Corporation | 1000 Spring Street | Silver Spring | Maryland | 20910 | United States |
| USWM, LLC | USWM, LLC | 4441 Springdale Rd | Louisville | Kentucky | 40241 | United States |
| Validus Pharmaceuticals LLC | Validus Pharmaceuticals LLC | 90 East Halsey Road, Suite 210 | Parsippany | New Jersey | 07054 | United States |
| Veloxis Pharmaceuticals, Inc. | Veloxis Pharmaceuticals, Inc. | 2000 Regency Pkwy Ste 500 | Cary | North Carolina | 27518 | United States |
| Vertex Pharmaceuticals Incorporated | Vertex Pharmaceuticals Incorporated | 50 Northern Avenue | Boston | Massachusetts | 02210 | United States |
| Vi-Jon, LLC | Vi-Jon, LLC | 8515 Page Ave | St. Louis | Missouri | 63114 | United States |
| Virbac Corporation | Virbac Corporation | 1301 Solana Blvd Suite 2400 Building 2 | Westlake | Texas | 76262 | United States |
| Virbac Corporation | Virbac AH, Inc | 1301 Solana Blvd Suite 2400 Building 2 | Westlake | Texas | 76262 | United States |
| Vitruvias Therapeutics Inc | Vitruvias Therapeutics Inc | 778 N DEAN RD STE 600 | Auburn | Alabama | 36830 | United States |
| VIVUS LLC | VIVUS LLC | 900 E Hamilton Ave Ste 550 | Campbell | California | 95008-0643 | United States |
| WellSpring Pharmaceutical Corporation | WellSpring Pharmaceutical Corporation | 5911 N. Honore Avenue Suite 211 | Sarasota | Florida | 34243 | United States |
| Winder Laboratories LLC | Winder Laboratories LLC | 716 Patrick Industrial Lane | Winder | Georgia | 30680-8333 | United States |
| Wisconsin Pharmacal Company, LLC | Wisconsin Pharmacal Company, LLC | 1 Pharmacal Way | Jackson | Wisconsin | 53037 | United States |
| Wisconsin Pharmacal Company, LLC | Lake Consumer Products, Inc. (subsidiary of Wisconsin Pharmacal) | 1 Pharmacal Way | Jackson | Wisconsin | 53037 | United States |

| Parent Company Name | Company Name | Street Address | City | State/Province | Zip/Postal Code | Country |
|---|---|---|---|---|---|---|
| Wockhardt Holding Corporation | Wockhardt Holding Corporation | 20 Waterview Blvd, 3rd Floor | Parsippany | New Jersey | 7054 | United States |
| Wockhardt Holding Corporation | Wockhardt USA LLC | 20 Waterview Blvd., 3rd Floor | Parsippany | New Jersey | 7054 | United States |
| Xeris Pharmaceuticals, Inc. | Xeris Pharmaceuticals, Inc. | 180 N.LaSalle St | Chicago | Illinois | 60601 | United States |
| XGen Pharmaceuticals DJB, Inc. | XGen Pharmaceuticals DJB, Inc. | 300 Daniel Zenker Drive | Horseheads | New York | 14845 | United States |
| Xiromed | Xiromed | 180 Park Ave | Florham Park | New York | 07932 | United States |
| Xiromed | Exeltis, Inc | 180 Park Ave | Florham Park | New Jersey | 07932 | United States |
| Xttrium Laboratories, Inc. | Xttrium Laboratories, Inc. | 1200 E. Business Center Dr | Mount Prospect | Illinois | 60056 | United States |
| ZO Skin Health Inc. | ZO Skin Health Inc. | 9685 Research Drive | Irvine | California | 92618 | United States |
| Zoetis | Zoetis | One Pfizer Way | Lee's Summit | Missouri | 64081 | United States |
| Zydus Pharmaceuticals USA Inc | Zydus Pharmaceuticals USA Inc | 73 Route 31 North | Pennington | New Jersey | 08534 | United States |
| Zydus Pharmaceuticals USA Inc | Sentynl Therapeutics, Inc. | 420 Stevens Ave Suite 200 | Solana Beach | California | 92075 | United States |
| Zydus Pharmaceuticals USA Inc | Viona Pharmaceuticals Inc. | 20 Commerce Drive, Suite 340 | Cranford | New Jersey | 07016 | United States |
| Zyla Life Sciences | Zyla Life Sciences | 100 S. Saunders Rd. Suite 300 | Lake Forest | Illinois | 60045 | United States |

# II. Contact Information

The primary contact person for MED-Project is:

Dr. Victoria Travis, PharmD, MS, MBA
National Program Director
MED-Project LLC
4096 Piedmont Ave Unit 174
Oakland, CA 94611
Phone: 1 (833) 633-7765
Fax: 1 (866) 633-1812
sanmateocounty@med-project.org

# III. Plan Definitions

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

**Call Center** is the MED-Project call center for Residents, which can be reached by callers at the toll-free number of 1-844-MED-PROJECT or 1-844-633-7765 (TTY: 711).

**Carrier** is the common carrier used to transport Unwanted Medicine.

**County** means the County of San Mateo, California[1].

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

**DEA Rule** is the DEA Final Rule, "Disposal of Controlled Substances," 79 Fed. Reg. 53520 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, Mail-Back Distribution Locations, libraries, fire stations, and Division staff that can be reached by callers at a toll-free number and/or by email at sanmateocounty@med-project.org.

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

**Injector Mail-Back Services** is the provision of pre-paid, pre-addressed, FDA-cleared sharps containers for the collection and disposal of Pre-filled Injector Products ("**Injector Mail-Back Packages")** by Vendor.

**Kiosk Drop-Off Site** is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine.

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

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

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

[1] This Plan does not apply to any incorporated areas of San Mateo County where the governing body of that incorporated area has authorized its own local health officer or environmental director to administer and enforce the provisions of California Health and Safety Code § 117800, et seq.

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

**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.

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

**Program** or **Product Stewardship Program** is the product stewardship program set forth in this 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 Carrier for transport to a reverse distributor.

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

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

**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 Carrier for transport to a reverse distributor.

**Service Convenience Goals** are the goals established in Ordinance § 4.116.050(b)(1).

**Service Technicians** are personnel trained to service Program kiosks.

**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.

**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[2]

For the purposes of the Plan, "Unwanted Medicine" includes all materials identified as "Covered Drugs" under Ordinance § 4.116.020(D) that qualify as "Unwanted Covered Drug[s]" under Ordinance § 4.116.020(V). According to the Ordinance, Covered Drugs means "a Drug in any form used by County residents, including prescription, nonprescription, brand name and generic drugs." Ordinance § 4.116.020(D). Unwanted Medicine does not include the following:

i. Expired undispensed samples direct from physicians' offices;
ii. Unused or expired drugs from hospitals and institutions;
iii. Bulk animal pharmaceuticals from farms (business use);
iv. Vitamins or supplements;
v. Herbal-based remedies and homeopathic drugs, products, or remedies;
vi. Compressed cylinders and mercury containing thermometers;
vii. Cosmetics, shampoos, sunscreens, toothpaste, lip balm, antiperspirants, or other personal care products that are regulated as both cosmetics and nonprescription drugs under the federal Food, Drug, and Cosmetic Act (Title 21 U.S.C. Chapter 9);
viii. Hard surface and toilet disinfectant cleaners;
ix. Drugs administered in a healthcare setting;
x. Drugs for which Producers provide a pharmaceutical product stewardship or take-back program as part of a federal Food and Drug Administration managed risk evaluation and mitigation strategy (Title 21 U.S.C. § 355-1);
xi. Drugs that are biological products, meaning any virus, therapeutic serum, toxin, antitoxin, or analogous product applicable to the prevention, treatment or cure of diseases or injuries of man, as these terms are defined by 21 C.F.R. § 600.3(h), 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 that do not contain a usable quantity of covered drugs; and
xiv. Schedule I or other illicit drugs.

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

[2] Unwanted Medicine collected at Kiosk Drop-Off Sites, in Standard Mail-Back Packages, and/or at Take-Back Events does not include Pre-filled Injector Products. In addition, inhalers cannot be accepted in Standard Mail-Back Packages.

# V. Collection of Unwanted Medicine

The Plan provides services to collect Unwanted Medicine, including controlled substances, in any dosage form. The collection methods and applicable legal requirements are described below.

## A. Unwanted Medicine Collection Program Implementation

### 1. Outreach

Per Ordinance § 4.116.030(e)(2), MED-Project continues to perform outreach via annual notification letters to potential Kiosk Drop-Off Sites. During the last round, MED-Project notified 25 sites with a licensed pharmacy of the opportunity to participate as a Kiosk Drop-Off Site.

LEAs and pharmacies that hosted kiosks in the County prior to the Program may transition to the Program upon entering into an agreement with MED-Project.

### 2. Implementation

MED-Project continues to satisfy the Service Convenience Goals through executed agreements with Kiosk Drop-Off Site Hosts. If there is a change and the number of Kiosk Drop-Off Sites falls below the Service Convenience Goals, MED-Project will satisfy the Service Convenience Goals in any Supervisorial District in which signed agreements have not been attained for the minimum number of Kiosk Drop-Off Sites through Mail-Back Distribution Locations. See Section V.3 for details on how MED-Project satisfies the Service Convenience Goals.

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

Per Ordinance § 4.116.050(b)(1), MED-Project has established at least one Kiosk Drop-Off Site in each Supervisorial District for every 20,000 Residents, geographically distributed to provide reasonably convenient and equitable access for all Residents. MED-Project has established a minimum of five (5) Kiosk Drop-Off Sites in each Supervisorial District.

MED-Project meets Service Convenience Goals by providing Kiosk Drop-Off Sites at over 50 locations as well as Mail-Back Services that are available 24 hours a day, every day of the year, via the MED-Project Website and Call Center. MED-Project has analyzed the populated areas in the County and has determined that the Service Convenience Goal is currently being met by MED-Project via the placement of Kiosk Drop-Off Sites across the County. MED-Project operates kiosks within five miles of all

incorporated cities within San Mateo County as shown in the map below in Figure 1. MED-Project understands populated areas to be defined as incorporated cities for the purpose of implementation. MED-Project has established Kiosk Drop-Off Sites within five miles of all incorporated cities and within five miles of all incorporated towns, where possible.

In Supervisorial Districts where a sufficient number of Kiosk Drop-Off Sites cannot be established, Mail-Back Distribution Locations and/or Take-Back Events will be established in order to supplement the disposal of Unwanted Medicine by Residents. If the number of Kiosk Drop-Off Sites falls below the Service Convenience Goals, MED-Project will seek to obtain additional agreements with Kiosk Drop-Off Site Hosts. Supplemental services such as Mail-Back Distribution Locations and/or Take-Back Events would then be decreased accordingly upon meeting the Service Convenience Goals.

Standard Mail-Back Services are available to all Residents including disabled and home-bound Residents upon request and are reviewed routinely for availability and effectiveness. See Section V.E for more information about the availability of Mail-Back Services.

In addition to the Kiosk Drop-Off Sites and Mail-Back Distribution Locations outlined above, MED-Project, as required by the Ordinance, will coordinate with all other approved stewardship plans to operate Kiosk Drop-Off Sites within County-owned pharmacies. See Coordination Section XVI. MED-Project operates a Kiosk Drop-Off site at the County-owned facility.

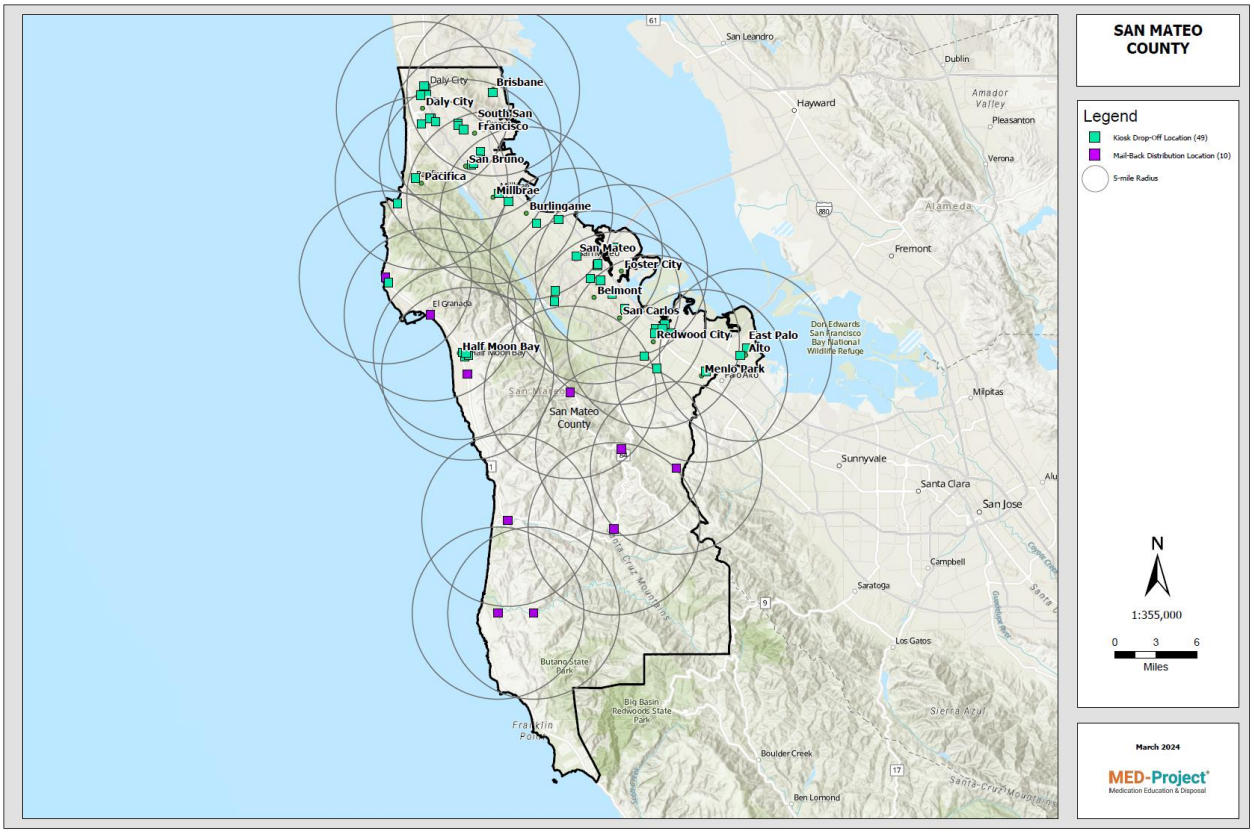


Figure 1: Kiosk Drop-Off Sites and Mail-Back Distribution Locations

## 4. Services

MED-Project assesses performance, gauges feedback, and revises its approach as appropriate. MED-Project continues outreach to organizations that may be available as future Kiosk Drop-Off Sites on an annual basis.

The Plan is implemented in a flexible manner, offering coverage to Residents through a combination of Kiosk Drop-Off Sites and/or Mail-Back Distribution Locations, if needed to meet the Service Convenience Goals. Over the course of ongoing implementation, additional Kiosk Drop-Off Sites will be established to the extent that additional eligible LEAs and/or DEA-registered collector pharmacies agree to participate, and contracts can be executed with such entities. MED-Project will establish Mail-Back Distribution Locations, when and if the Service Convenience Goals are not met. For every engagement with LEAs and pharmacies establishing Kiosk Drop-Off Sites, and/or conducting of Take-Back Events, contracts outlining the responsibilities of all involved parties will be drafted, reviewed by appropriate entities, and signed by all parties before MED-Project installs kiosks and/or conducts Take-Back Events.

Although Kiosk Drop-Off Sites do not provide kiosk collection for Pre-filled Injector Products, Injector Mail-Back Services for Pre-filled Injector Products are available through the Call Center and MED-Project Website for all Residents.

MED-Project will inform the County of changes according to and as required by the Ordinance.

## B. Kiosk Drop-Off Sites

Kiosk Drop-Off Sites are strategically placed throughout the County in order to best meet the Service Convenience Goals established by the Ordinance. All Kiosk Drop-Off Sites will provide Residents with access to Program kiosks during regular business hours.

### 1. Kiosk Drop-Off Site Locations

MED-Project initially contacted 24 LEAs and 115 sites with a licensed pharmacy located in the County about the opportunity to serve as a Kiosk Drop-Off Site.

MED-Project continues outreach to potential Kiosk Drop-Off Sites that are not participating in the Program via annual notification letters sent to nonparticipating or new Retail Pharmacies, according to requirements in Ordinance § 4.116.030(e)(2).

MED-Project will establish Mail-Back Distribution Locations in any Supervisorial District if there are fewer than the required number of Kiosk Drop-Off Sites. See Section V.E for more information on Mail-Back Services.

As required under Ordinance § 4.116.050(b)(4), the Plan will include as a Kiosk Drop-Off Site any eligible retail pharmacy or LEA 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 within three months of their offer to participate.

MED-Project has established 50 kiosks at 49 Kiosk Drop-Off Sites that are currently participating in the Program as listed in Appendix A and shown in Figure 1.

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

Kiosk installation shall be the responsibility of MED-Project at Kiosk Drop-Off Sites when the Kiosk Drop-Off Site Host has identified a compliant placement location. All kiosks in the Program must be securely placed and maintained inside a collector's registered location or LEA's physical location in accordance with DEA Rule §§ 1317.75(d)(1) and 1317.35(a). At pharmacies, kiosks will be placed in the immediate proximity of a designated area where controlled substances are stored and at which an employee is present (i.e., can be seen from the counter), pursuant to § 1317.75(d)(2). At a hospital or clinic with an on-site pharmacy, kiosks will be placed in an area regularly monitored by employees but not near areas of the facility where urgent or emergency care is provided. § 1317.75(d)(2)(i). Kiosk placement will also comply with any applicable Board of Pharmacy requirements. Costs associated with installation and maintenance will be paid by MED-Project per the contracts with the Kiosk Drop-Off Site Hosts.

The maintenance program will address items such as:

- Service Technician(s) inspect the kiosk during kiosk collection service and escalate issues for maintenance as needed. The inspection includes the functionality of mechanisms, such as the locks, doors, and drop-slots.
- Reporting by the Kiosk Drop-Off Site Host of damage to a kiosk or requested maintenance service. A summary of the requested maintenance log is available upon request.

Vendor responds within two to three business days of a requested maintenance service unless the requested service requires an Unplanned Event Response. See Section V.B.7.

## 3. Kiosk Specifications

Kiosks are offered to all eligible host locations. Pursuant to § 1317.75(e), MED-Project kiosks at pharmacies are:

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

The design of the pharmacy kiosk and signage (Appendix B) 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-bound 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 Host. MED-Project pharmacy kiosks come with appropriate regulatory signage and instructions, including an instruction to remove personal information from any Unwanted Medicine and packaging before depositing them and language required under the DEA Rule[3] and by the Board of Pharmacy. Kiosk signage provides information about what is and is not accepted in the kiosk.

[3] Specifically, as required under § 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."

Additionally, under § 1317.60(a), MED-Project kiosk inner liners are:

- Waterproof, tamper-evident, and tear-resistant;
- 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 comply with Board of Pharmacy requirements.

While the DEA Rule does not require LEA kiosks to meet these same requirements, MED-Project will offer these kiosks and inner liners to LEAs. See DEA Rule at 53531.

## 4. Kiosk Collection

MED-Project's Kiosk Drop-Off Site collection system follows DEA requirements for pharmacy and LEA Unwanted Medicine Kiosk Drop-Off Sites. Per these requirements:

- Kiosk Drop-Off Site employees shall hold the two keys to unlock the kiosk;
- Vendor, pharmacies, and LEAs taking part in the Plan shall keep all records required under the DEA Rule, including those required under DEA Rule §§ 1304 and 1317.35;
- Inner liners provided in the kiosk are opaque to prevent visual recognition of the contents; and
- Each inner liner and box provided by Vendor is pre-paid and pre-addressed for transport and disposal.

### a. Pharmacy Kiosk Inner Liner Handling and Disposal

The DEA Rule limits inner liner access to employees of the collector and requires two employees to seal the inner liner at once following its removal from the pharmacy kiosk's permanent outer container. 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. DEA Rule § 1317.60(c). DEA Rule § 1317.75(c) prohibits the counting, sorting, inventorying, or individual handling of any substances deposited into a pharmacy kiosk.

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 Carrier delivery to or pick-up by a reverse distributor or distributor, or with DEA assistance.

### b. LEA Kiosk Inner Liner Handling and Disposal

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

At LEA Kiosk Drop-Off Sites, Vendor and the LEA will maintain any records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence under DEA Rule § 1317.35.

Any collected Unwanted Medicine should 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. DEA Rule § 1317.35. Collected Unwanted Medicine should 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. DEA Rule § 1317.35.

## 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 Service method. 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 Service method, the Kiosk Drop-Off Site employees shall prepare the inner liner for shipment. The On-Demand Collection Service method enables a Kiosk Drop-Off Site Host to directly control the timing for servicing the kiosk and to seal the liner for packaging and transport at a time of its choosing. The Kiosk Drop-Off Site employees can schedule Carrier to pick up the packaged inner liner or can offer the packaged inner liner during a regular 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, a 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 method will have regular year-round scheduled time for pick-up by Carrier based on the specific location's business hours and volume of collected medications.

### a. DOT Special Permit Requirements

Kiosk Drop-Off Site Hosts operate under a special permit from the DOT[4] (the "Special Permit"), which permits the use of specific packaging and transportation in commerce of Unwanted Medicine. The Special Permit allows for certain consumer-generated unwanted medicine to be commingled in the same container and shipped, so long as

[4] Carriers currently operate under DOT Special Permit 21489, the requirements of which are outlined in this section. The current version of the permit is available at the below link: https://www.phmsa.dot.gov/hazmat/documents/offer/SP21489.pdf/2022124618/SP21489

the container is shipped under specific packaging requirements outlined in the Special Permit. MED-Project provides all participating Kiosk Drop-Off Site Hosts with training materials outlining requirements of the Special Permit, which include detailed instructions on closure, packing, and shipping under the Special Permit. The Special Permit requires that the participating Kiosk Drop-Off Site Hosts have met the requirements in the Special Permit, including training requirements and maintaining a copy of the relevant Special Permit on the premises.

## 6. Kiosk Service

When servicing a kiosk at a Kiosk Drop-Off Site, two On-Demand Collection Service Kiosk Drop-Off Site employees, or a 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 following the DOT Hazardous Materials Regulations (“HMR”).
- Schedule a pick-up from Carrier to be completed within a few business days or offer the package holding the sealed inner liner for pick-up by routine Carrier service at the Unwanted Medicine Kiosk Drop-Off Site.

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

## 7. Unplanned Event Preparedness

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

A major event, such as a flood, earthquake or fire, may require response by a service team. This event can jeopardize the security characteristics of the kiosk as well as the

structural integrity of the participating location. The team will assess the safety of the area along with the locations to be serviced. Once it is determined the area is safe for access, the team will work to secure the kiosk and remove its contents.

Along with major event preparedness, Vendor provides timely responses to events that may cause an inconvenience to the Kiosk Drop-Off Site. An example of this kind of event would be if the kiosk is giving off an odor prior to the scheduled service date. The Kiosk Drop-Off Site Host will contact MED-Project via the dedicated Help Desk. Vendor is able to respond within two to three hours when notified of a need for emergency response. If the request is not an emergency that poses an immediate threat to the environment or health and relates to the Kiosk Drop-Off Site requesting an expedited service for a kiosk filling up, the Program is designed to provide services within 48 hours from the time such a request is made.

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

## C. Take-Back Events

MED-Project may schedule Take-Back Events in any Supervisorial District where the Service Convenience Goals are not met through signed Kiosk Drop-Off Site agreements and/or Mail-Back Distribution Locations.

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

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

### 1. Method

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

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 every Take-Back Event 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 § 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 § 1317.65(e); however, Vendor may assist LEAs in the collection of Unwanted Medicine at Take-Back Events. See DEA Rule at 53539.

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. 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 and shipped in compliance with all applicable laws, regulations, and other legal requirements. Containers and inner liners will be tracked at pick-up and destruction via unique identifiers and incinerated at a facility identified in Section X. Vendor will ship the containers (and inner liners) in accordance with the requirements outlined in Section XIV.B.

### 3. Fees and Costs

MED-Project will pay all administrative and operational costs and fees associated with the Take-Back Events.

## D. Disposal of Unwanted Medicine

Vendor and Carrier shall manage the Unwanted Medicine from Scheduled Collection Services 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 all Kiosk Drop-Off Sites and/or Take-Back Events to the respective facilities identified in Section X.

All inner liners will be destroyed in accordance with all applicable laws, regulations, and other legal requirements at the disposal facilities identified in Section X. On-Demand

Collection Services Kiosk Drop-Off Sites will manage sealed inner liners as described in Section V.B.4(b).

MED-Project will dispose of Unwanted Medicine at permitted Hazardous Waste Incinerators and Medical Waste Incinerators as identified in Section X. MED-Project is requesting that the Director maintain approval for the use of Medical Waste Incinerators for the disposal of Unwanted Medicine from the County pursuant to §§ 4.116.070(c) and 4.116.110(f) of the Ordinance. Please refer to MED-Project's petition included in Appendix C.

## E. Mail-Back Services for Unwanted Medicine

In addition to established Kiosk Drop-Off Sites, MED-Project offers comprehensive Mail-Back Services throughout the County for all Residents. Based on MED-Project's experience operating stewardship programs in San Mateo County and other jurisdictions, Mail-Back Services provide a year-round option for Residents to obtain Mail-Back Packages and educational materials promoting the safe storage and proper disposal of Unwanted Medicine. Because Mail-Back Services are available year-round, Residents can obtain Mail-Back Packages whenever they need to dispose of Unwanted Medicine.

MED-Project provides three types of Mail-Back Services that are available through the Call Center and MED-Project Website:

- Standard Mail-Back Services for all Residents as described in Section V.E.1;
- Injector Mail-Back Services for the collection of Pre-filled Injector Products for all Residents as described in Section V.E.2; and
- Inhaler Mail-Back Services for the collection of inhalers for all Residents as described in Section V.E.3.

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

MED-Project provides Standard Mail-Back Services at no cost to all Residents including disabled and home-bound Residents via the Call Center and/or MED-Project Website. 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 for the collection of Unwanted Medicine, not including inhalers and Pre-filled Injector Products 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 Packages 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).

## 2. Injector Mail-Back Services for Pre-filled Injector Products

For Pre-filled Injector Products, MED-Project offers all Residents including disabled and home-bound Residents Injector Mail-Back Services via the Call Center and/or MED-Project Website. The pre-paid shipping label directs the Injector Mail-Back Package to the facility identified in Section X. An instruction sheet is included with the Injector Mail-Back Package that describes how to properly dispose of Pre-filled Injector Products and explains what materials may be placed in a sharps container, how to use the sharps container, and how to return the Injector Mail-Back Package. Residents are instructed not to commingle Pre-filled Injector Products with other Unwanted Medicine.

See Appendix D for a sample package and package specifications.

## 3. Inhaler Mail-Back Services for Inhalers

For inhalers, MED-Project offers all Residents including disabled and home-bound Residents Inhaler Mail-Back Services via the Call Center and/or MED-Project Website. The pre-paid shipping label directs the Inhaler Mail-Back Package to the facility identified in Section X. An instruction sheet is included with the Inhaler Mail-Back Package that describes how to properly dispose of inhalers and explains what materials may be placed in the Inhaler Mail-Back Package, and how to return the Inhaler Mail-Back Package. Residents are instructed not to commingle inhalers with other Unwanted Medicine.

See Appendix D for sample package specifications.

## 4. Mail-Back Package Availability

All Residents including disabled and home-bound Residents may request Mail-Back Services by calling the Call Center and/or through a link on the MED-Project Website. Home healthcare professionals providing services to disabled and home-bound Residents may also request Mail-Back Services, on behalf of a Resident, through the Call Center and/or through a link on the MED-Project Website. Upon such request, Residents are provided Mail-Back Packages complying with DEA requirements, if applicable.

If a Supervisorial District has fewer than the required number of signed agreements from Kiosk Drop-Off Site Hosts, then MED-Project will supplement Kiosk Drop-Off Sites by establishing Mail-Back Distribution Locations for the dissemination of Standard Mail-Back Packages until the Service Convenience Goals are met. If needed, MED-Project will work with facilities, such as fire stations and/or libraries, to ensure that Mail-Back Distribution Locations are conveniently located. MED-Project has established 10 Mail-Back Distribution Locations; these are listed in Appendix A and shown in Figure 1.

Injector Mail-Back Services for Pre-filled Injector Products and Inhaler Mail-Back Services are available to all Residents through the Call Center and/or MED-Project Website.

Mail-Back Packages are shipped to Residents within seven business days of their request.

## 5. Mail-Back Package Collection and Disposal

The following general procedures are applied to the request and processing of Mail-Back Packages:

Requests by Residents made via Call Center/MED-Project Website and are verified and logged;

1. Requests by Residents are processed, and tracking numbers are logged;
2. Mail-Back Packages are sent to requesting Residents;
3. Residents place Unwanted Medicine in Mail-Back Packages per instructions;
4. Residents place Mail-Back Packages in mail system;
5. Mail-Back Packages received by facility identified in Section X and unique identifier on returned Mail-Back Packages are logged as “returned”;
6. Mail-Back Packages are disposed of; and
7. Information on returned Mail-Back Packages are reconciled with log of Mail-Back Packages shipped to Residents to verify type and average weight of Mail-Back Packages.

All Mail-Back Packages contain an insert with instructions for use and information about other options for disposing of Unwanted Medicine in the Required Languages. Residents are directed to follow the instructions provided via Mail-Back Services. Mail-

Back Services direct packages to an approved facility in accordance with their contents and packages are handled in compliance with all applicable laws.

For Standard Mail-Back Packages, upon arriving at the destruction facility, they are scanned for receipt verification and then rendered non-retrievable by incineration at the disposal facility listed in Section X. Any storage of Standard Mail-Back Packages received 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 is destroyed promptly.

# VI. Plan and Collection Goals

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

| Goal Area | Short-Term | Long-Term |
|---|---|---|
| Collection | MED-Project's goal is to maintain the Service Convenience Goals through established Kiosk Drop-Off Sites with an estimated average collection of 100 pounds per Kiosk Drop-Off Site annually. | MED-Project's goal is to maintain the Service Convenience Goals through established Kiosk Drop-Off Sites and estimated average collection weight annually.<br><br>In the event that MED-Project no longer meets the Service Convenience Goal, MED-Project will work with any other existing and approved program operator(s) to request and organize joint Take-Back events at least annually in areas with no access to Kiosk Drop-Off sites or Mail-Back Distribution locations within five miles of an incorporated city. |
| Education & Public Outreach | Starting the first full calendar year after approval of the Plan, reach 25% of the 18 years of age and over population through media outreach tactics by the end of year (1) one (i.e., end of 2024). | Achieve 50% reach of the 18 years of age and over population through media outreach tactics by the end of the second calendar year (i.e., end of 2025) after Plan approval, and beyond.<br><br>MED-Project's awareness goal will be 50% awareness among survey respondents. |

| Goal Area | Short-Term | Long-Term |
|---|---|---|
| | | On an annual basis, provide information to pharmacies, health care facilities, veterinarian facilities, and other interested parties, on how to obtain materials. |

# VII. Patient Privacy

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

In addition to kiosk signage, all MED-Project instructional, promotional, and educational materials encourage Residents to protect their information by ensuring that personally identifiable information is not present when utilizing Mail-Back Services or depositing Unwanted Medicine into kiosks.

Vendor has additional protections available for keeping personally identifiable information safe and secure. Service Technicians are trained in managing items containing sensitive patient information. Privacy training is part of a Service Technician's prerequisite for field services. As added protection, containers, packages, and envelopes used for Mail-Back Services are opaque rather than clear. In addition, inner liners used at Kiosk Drop-Off Sites and/or Take-Back Events are opaque rather than clear, in compliance with the DEA Rule.

# VIII. Call Center

Per Ordinance § 4.116.060, MED-Project will provide a Call Center in the Required Languages jointly with all other approved stewardship plans operating in the County. Questions from Residents will be managed through the Call Center with the support of an agent. See Coordination Section XVI.

The Call Center provides information about:

- Items that can be disposed of;
- Disposal options;
- The MED-Project Website; and
- How to request 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 flow is provided in Appendix F.

# IX. Training

The Help Desk will support two general communication functions:

1. Answer questions and monitor comments from participating Kiosk Drop-Off Sites and Mail-Back Distribution Locations; and
2. Support and direct service requests from participating Kiosk Drop-Off Sites and Mail-Back Distribution Locations.

Any messages received by the Help Desk from Kiosk Drop-Off Sites and Mail-Back Distribution Locations will be returned within one business day.

Vendor will comply with all applicable laws, regulations, and other legal requirements. Vendor for Kiosk Drop-Off Sites, Take-Back Events, and Standard Mail-Back Services has an internal training process that includes the following:

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

- Emergency Spill Response, Communication Devices, Alarm Systems;
- DOT Hazardous Materials Training meeting the requirements of 49 CFR §172.704(a), including General Awareness/Familiarization, Safety Training, Security Awareness Training, and Function-Specific training;
- DOT Hazardous Materials Training meeting the requirement in 49 CFR §172.704(a) for In-Depth Security Training (if applicable);
- Personal Protective Equipment (“PPE”) Utilization;
- DEA Controlled Substance Handling Protocols;
- Health Insurance Portability and Accountability Act ("HIPAA") Requirements; and
- Occupational Safety and Health Administration (“OSHA”) Bloodborne Pathogens Standards.

For more information about how entities participating in the Program will operate and comply with all applicable federal and state laws, rules, and regulations, see Section XIV.

## A. Kiosk Drop-Off Site Training

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

MED-Project provides Kiosk Drop-Off Sites a review of available training materials and resources to support their effective participation in the Program. The training materials and other resources MED-Project provides Kiosk Drop-Off Sites are outlined below.

- MED-Project will conduct and support Kiosk Drop-Off Site inspections. Annually, at different times of the year, MED-Project will:

    - Verify, via inspection, that all Kiosk Drop-Off Site Hosts are compliant with applicable federal and state laws, rules, and regulations for the Program, as contractually required for their participation in the Program. During this inspection, MED-Project will remind Kiosk Drop-Off Site Hosts about Program training resources and requirements (including how to receive educational and promotional materials from MED-Project).
    - Request Kiosk Drop-Off Site Hosts to conduct a self-inspection confirming the Kiosk Drop-Off Site Host is compliant with all applicable federal and state laws, rules, and regulations for the Program.

MED-Project will assist Kiosk Drop-Off Site Hosts in understanding and resolving any issues identified in this inspection. During the annual inspection and self-inspection, MED-Project will remind Kiosk Drop-Off Site Hosts about Program resources and requirements, including but not limited to how to receive support and outreach materials from MED-Project.

- On a quarterly basis, MED-Project will distribute information to participating Kiosk Drop-Off Site Hosts that include training elements, such as reminders about compliance with applicable laws or reminders about the resources MED-Project makes available to support effective Program participation. Kiosk Drop-Off Site Hosts are currently provided with training materials to assist in providing all employees with proper training as required under MED-Project contracts with the Kiosk Drop-Off Site Hosts. Training materials include materials addressing permit requirements; management of kiosks, including cleanliness, maintenance requests, and inspection procedures; and proper inner liner setup and closure, and preparation of shipment and timely removal of the packaged inner liner from the site for Kiosk Drop-Off Site Hosts utilizing the On-Demand Collection Service method.
- Kiosk Drop-Off Site Hosts always have access to MED-Project’s 24/7 Help Desk for support. The Help Desk will support communication functions including:
    - Answer questions and monitor comments from participating Kiosk Drop-Off Site Hosts.
    - Provide requested training materials to participating Kiosk Drop-Off Site Hosts.
    - Support and direct service requests from participating Kiosk Drop-Off Site Hosts.
    - Receive and fulfill requests for printed educational and outreach materials for distribution to Residents.

MED-Project will include information about the Help Desk in communications and resources, including training materials, for Kiosk Drop-Off Site Hosts. MED-Project's Help Desk can be reached at (833) 633-7765.

# X. Vendor, Transporter, and Disposal Facility Information

## A. Vendor

| Name | Address | Phone | Website | Type | Penalty Record (5 years) |
|---|---|---|---|---|---|
| Covanta Environmental Solutions, LLC | 190 Shellyland Road, Manheim, PA 17545 | (717) 653-8882 | www.covanta.com | Vendor | None |
| PureWay Compliance, Inc. | 16225 Park Ten Place, Ste 830, Houston, TX 77084 | (877) 765-3030 | http://pureway.com/ | Vendor | None |
| Stericycle, Inc. | 2355 Waukegan Road, Bannockburn, IL 60015 | (847) 367-5910 | www.stericycleenvironmental.com | Vendor | None |

## B. Reverse Distributor Facilities

| Name | Address | Phone | Website | Type | Penalty Record (5 years) |
|---|---|---|---|---|---|
| Covanta Environmental Solutions, LLC | 2515 S. Holt Rd, Indianapolis, IN 46241 | (317) 719-6397 | https://www.covanta.com/Our-Facilities/CES-Indy | DEA Registered Collector and Reverse Distributor | None |
| Covanta Manheim, Pennsylvania Facility | 190 Shellyland Road, Manheim, PA 17545 | (717) 653-8882 | www.covanta.com | DEA Registered Collector and | None |

| Name | Address | Phone | Website | Type | Penalty Record (5 years) |
|---|---|---|---|---|---|
| | | | | Reverse Distributor | |
| Stericycle, Inc. Warren, Ohio Facility | 1901 Pine Avenue, SE, Warren, OH 44483 | (330) 393-0370 | www.stericycle.com/service-locations/ohio/warren | DEA Registered Collector and Reverse Distributor | None |

## C. Transporters and Carriers

| Name | Address | Phone | Website | Type | Penalty Record (5 years) |
|---|---|---|---|---|---|
| Clean Harbors Environmental Services Inc. | 42 Longwater Drive, Norwell, MA 02061 | (781) 792-5000 | www.cleanharbors.com | Private Carrier | 1 reported case closed 12/10/2019 |
| Covanta Environmental Solutions Carriers II, LLC | 5300 N 33rd St, Milwaukee, WI 53209 | (336) 683-0809 | www.covanta.com | Private Carrier | None |
| Covanta Environmental Solutions dba Chesapeake Waste Solutions, LLC. | 190 Shellyland Road, Manheim, PA 17545 | (336) 683-0809 | www.covanta.com | Private Carrier | None |
| Doncin Transport, Inc. | 3478 Sunnyside Rd, Manheim, PA 17545 | (717) 689-5129 | None provided | Contract Carrier | None |
| EMS Dispatch, Inc. | 316 W Mt Vernon St, Lansdale, PA 19446 | (717) 689-5129 | None provided | Contract Carrier | None |

| | | | | | |
|---|---|---|---|---|---|
| Heritage Transport | 1626 Research Way, Indianapolis, IN 46231 | (317) 486-2973 | http://www.heritage-enviro.com/ | Hazardous Waste Transporter | None |
| Omada Worldwide Expedite, Inc. | 853 S Columbia Road, Suite 175, Plainfield, IN 46168 | (317) 293-5777 | www.omadaworldwide.com | Contract Carrier | None |
| Online Transport, Inc. | 6311 W Stoner Dr, Greenfield, IN 46140 | (317) 894-2159 | http://www.onlinetransport.com/ | Contract Carrier | None |
| Ross Transportation Services, Inc. | 36790 Giles Road, Grafton, OH 44044 | (440) 366-2000 | http://www.rossenvironmental.com/services/transportation/ | Hazardous Waste Transporter | None |
| Sodrel Logistics, LLC | 1 Sodrel Dr, Clarksville, IN 47129 | (812) 282-7941 | http://www.sodreltrucklines.com | Contract Carrier | None |
| Stericycle, Inc. | 2355 Waukegan Rd, Bannockburn, IL 60015 | (847) 367-5910 | www.Stericycle.com | Hazardous Waste Transporter | None |
| Tri-State Motor Transit Co. | 8141 E 7th St, Joplin, MO 64801 | (877) 860-1600 | https://tristatesecured.com/ | Contract Carrier | None |
| United Parcel Service, Inc. | 55 Glenlake Parkway NE, Atlanta, GA 30328 | (800) PICK-UPS | www.UPS.com/ | Carrier | Closed Case 9/18/2019 VA-2019-0057-US1436” |
| United States Postal Service | 475 L’Enfant Plaza SW, Washington, DC 20260 | (202) 268-2000 | www.USPS.com/ | Carrier | *See* USPS SEC filings |

| | | | | | |
|---|---|---|---|---|---|
| Waste Recovery Solutions, LLC | 343 King St, Myerstown, PA 17067 | (336) 683-0809 | www.covanta.com | Hazardous Waste Transporter | None |

## D. Disposal Facilities

| Name | Address | Phone | Website | Type | Penalty Record (5 years) |
|---|---|---|---|---|---|
| Clean Harbors Aragonite, LLC | 11600 North Aptus Rd, Grantsville, UT 84029 | (435) 884-8900 | www.cleanharbors.com | Hazardous Waste Incinerator | *See* Appendix E |
| Curtis Bay Energy, LP | 3200 Hawkins Point Road, Baltimore, MD 21226 | (855) 228-1715 | www.curtisbayenergy.com | Medical Waste Incinerator | *See* Appendix E |
| Heritage Thermal Services – Ohio | 1250 Saint George Street, East Liverpool, OH 43920 | (800) 545-7655 | http://www.heritage-thermal.com/ | Hazardous Waste Incinerator | *See* Appendix E |
| Ross Incineration Services, Inc. | 36790 Giles Road, Grafton, OH 44044 | (440)-748-5800 | http://www.rossenvironmental.com/ | Hazardous Waste Incinerator | *See* Appendix E |
| Stericycle, Inc., Warren, Ohio Facility | 1901 Pine Avenue S.E., Warren, OH 44483 | (330) 393-0370 | https://www.stericycle.com/service-locations/ohio/warren | Medical Waste Incinerator | None |

# XI. Unwanted Medicine Educational and Outreach Programming

## A. Overview

Per Ordinance § 4.116.060, the following communications plan includes a description of the public education and outreach efforts that MED-Project will undertake 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 has developed a communications campaign featuring both broad communications tactics and targeted outreach to audiences directly involved in the distribution to and use of medicines to Residents on an annual basis. These audiences shall include:

- General public;
- Pharmacies, including education for dispensers of Unwanted Medicine;
- Retailers of Unwanted Medicine;
- Health care providers and their patients;
- Veterinary facilities and veterinary hospitals;
- Public health facilities; and/or
- Law enforcement agencies.

The Program includes efforts to reach the Residents that are 18 years of age and older; outreach to community organizations serving a broad range of audiences; provide the Call Center in the Required Languages; and provide educational information through a range of media platforms.

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

Key points of emphasis might include:

- The importance of taking medicine 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 medicine;
- 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 education and outreach program will include multiple and varied elements designed to reach Residents and provide consistent access to timely and relevant information. MED-Project will employ paid media best practices that aid in message association and program awareness.

MED-Project provides information about how to obtain printed materials on an annual basis during site visits to Kiosk Drop-Off Sites, and upon request, to LEAs, pharmacies, health care providers and systems, health associations, local government agencies, veterinarians, veterinary hospitals, and other community organizations.

MED-Project's communication tools and channels will include the following.

### 1. Phone

MED-Project provides a Call Center for Residents to obtain information about Kiosk Drop-Off Sites and Mail-Back Distribution Locations, educational materials, and other aspects of the Program 24 hours a day, seven days a week. The Call Center provides:

- Human representatives are available in English and Spanish. If a caller requires assistance in another language, human representatives are available to provide additional assistance through a translation service with live translation in the Required Languages. Information about how the Program works, where to obtain more information (e.g., the MED-Project Website), and where to find Kiosk Drop-Off Sites and/or Mail-Back Distribution Locations, if applicable, in the Resident's ZIP code or local area;
- Mail-Back Package request submission;
- Information directing callers with medical emergencies to call 911 and directing Residents with medication-related questions to contact their health care provider(s); and
- TTY services for Residents who are speech and hearing impaired.

Please see Appendix F for a sample diagram of the Call Center flow.

### 2. MED-Project Website

MED-Project has a mobile-friendly MED-Project Website with translations in the Required Languages. The MED-Project Website provides web pages to help Residents find locations of Kiosk Drop-Off Sites and Mail-Back Distribution Locations, educational materials, frequently asked questions and responses, and results of the most recent survey of Program awareness. The Plan includes sample web pages for the MED-

Project Website. See Appendix G. The MED-Project Website includes access contact information for Residents and a frequently asked questions ("FAQ") section. Translations of the FAQ are available in the Required Languages.

Community and government organizations and other public interest groups seeking materials to promote the Program are encouraged to access these resources.

The MED-Project Website is:

- Mobile-responsive and accessible by common device and browser systems.
- Translated into multiple languages using a commercially available third-party translate-based product, including in the Required Languages.
- Maintained to keep information up-to-date and accurate.

The MED-Project Website content provides:

- Information on collection options for Unwanted Medicine.
- A list of Kiosk Drop-Off Sites, including a ZIP code-based map locator provided on a publicly available, third-party platform to help Residents find the nearest disposal locations.
- A mechanism to accept requests for Mail-Back Packages from Residents.
- Information to promote the Program, including instructions for safe handling and proper disposal of Unwanted Medicine.
- User-friendly access to public service announcements used in MED-Project's media campaigns.
- Links to MED-Project's social media webpages.

## 3. Materials

Educational materials about the Program and how to properly dispose of Unwanted Medicine are available on the MED-Project Website and are provided to the Kiosk Drop-Off Sites, potential third-party partners, and community organizations, upon request.

MED-Project will provide educational and promotional materials to licensed pharmacies, healthcare facilities, and veterinary facilities at least annually. MED-Project utilizes the California Department of Consumer Affairs website at https://www.dca.ca.gov/consumers/public_info/index.shtml to identify new facilities. MED-Project will encourage participating locations to display outreach materials in high traffic areas. Accordingly, MED-Project will continue to provide materials, as requested, to facilities and will periodically check that these materials are prominently displayed. MED-Project will provide educational and promotional materials to other interested parties upon request.

Educational materials will be reviewed at least every two years and will be updated as needed based on the review. These materials will use plain language and explanatory images to promote consumer education and collection options to Residents with limited English proficiency and will be provided in Required Languages.

## 4. Media Outreach

The education and outreach program will include multiple and varied elements designed to reach Residents and provide consistent access to timely and relevant information. MED-Project will employ paid media best practices that aid in message association, and program awareness.

MED-Project shall rely on efficient, broad reach, digital tactics to deliver the bulk of advertising impressions and provide consistent messaging during each reporting year. These digital tactics may be supplemented by offline channels, where needed, to further bolster reach among Residents. The final media mix and channel allocation will be based on a detailed media planning process and may be subject to change.

# XII. Survey

Per Ordinance § 4.116.060(a)(4), MED-Project coordinates with all other approved stewardship plans, if applicable, to conduct a biennial survey of Residents, pharmacists, veterinarians, and/or health professionals who interact with members of the community, according to requirements in the Ordinance. See Coordination Section XIX.

Survey questions are designed to measure, at a minimum, (1) percent awareness of the Programs, (2) whether drop-off sites and other collection methods are convenient and easy to use, and (3) knowledge and attitudes about risks of abuse, poisonings, and overdoses from prescription and nonprescription drugs used in the home. As required by the Ordinance § 4.116.060(a)(4), draft survey questions are submitted to the Director for review and comment at least thirty (30) days prior to distribution. Results of the survey are reported to the Director and made public on the MED-Project Website described under Section XI.D. The privacy of all survey respondents is maintained.

The biennial survey is conducted in the Required Languages and according to requirements outlined in the Ordinance.

# XIII. Packaging

The Ordinance requires that a Plan consider "separating covered drugs from packaging to the extent possible to reduce transportation and disposal costs; and recycling of Drug packaging to the extent feasible." Ordinance § 4.116.040(h).

MED-Project has considered and evaluated options for the separation and recycling of drug packaging. Separating and recycling drug packaging collected under the Plan would require the management of separate waste streams at Kiosk Drop-Off Sites, including a waste stream for drug packaging and a waste stream for the drugs themselves.

While drug packaging is expected to constitute a significant amount of the waste incinerated under the Plan, MED-Project has concluded that separation of inner and/or outer packaging form Unwanted Medicine and/or recycling would raise three significant concerns:

1. Separating and recycling drug packaging could result in the disclosure of confidential patient information appearing on prescription drug packaging;
2. Separating and recycling drug packaging could increase the potential for releases and leakage of Unwanted Medicine; and
3. Separating and recycling drug packaging could increase diversion risk by adding additional steps to the collection process and, because drug packaging is often used in drug counterfeiting, could be a diversion target itself.

For these reasons, the Plan does not provide for the separation and recycling of packaging from Unwanted Medicine.

MED-Project education and outreach materials instruct Residents to return Unwanted Medicine at a Kiosk Drop-Off Site or via Mail-Back Services, in its original container or in a sealed bag. These materials encourage Residents who transfer their Unwanted Medicine in a sealed bag to recycle all remaining packaging.

# XIV. Compliance with Applicable Laws, Regulations, and Other Legal Requirements

The Ordinance requires that a Plan describe how all entities participating in the Program will "operate under" all applicable laws, regulations, and other legal requirements. Ordinance § 4.116.040(d). 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.

The following section describes the policies and procedures maintained for the Program relating to training and meeting applicable laws, regulations, and legal requirements. The relevant policies and procedures are codified in or required under MED-Project's agreements with its Vendors, Kiosk Drop-Off Site Hosts, LEAs, and LEAs supporting Take-Back Events involved in the collection and disposal of Unwanted Medicine under the Program.

MED-Project will, at least annually, verify via inspection, that all Kiosk Drop-Off Site Hosts are compliant with applicable federal and state laws, rules, and regulations as contractually required for their participation in the Program.

MED-Project will verify collection and disposal Vendor performance via periodic Vendor audits and annually through:

- Review of Vendor documentation.
- Review of processes and procedures for compliance with relevant regulatory agency requirements.
- Review of processes and procedures to ensure satisfactory service levels are in place to ensure the secure collection and disposal of covered drugs.

MED-Project contracts for Vendors involved in the collection and disposal of Unwanted Medicine collected under the Program require that Vendor:

- Follow all applicable laws, regulations, and other legal requirements.
- Maintain all professional and governmental permits, licenses, consents, authorizations, and certifications required by applicable laws for the performance of Program services.
- Provide certification that all applicable employee trainings are complete.
- Comply with industry-standard safety and security procedures.
- Use commercially reasonable measures to prevent theft or diversion of covered drugs.
- Report safety, security, or other procedural deviations.
- Maintain comprehensive information security programs and notify MED-Project in the event of a data breach.

MED-Project agreements with Kiosk Drop-Off Site Hosts require that the Kiosk Drop-Off Site:

- Comply with all applicable laws regarding the collection, handling, processing, and disposal of covered drugs.
- Possess all required authorizations to enter into an agreement for Program services.
- Identify a responsible manager and provide qualified staff.
- Complete documentation under all applicable laws for kiosk delivery, installation, or removal and for covered drug collection, storage, transportation, or disposal.
- Establish and implement procedures limiting access to kiosk keys to qualified staff.

MED-Project agreements for Take-Back Events require that law enforcement:

- Maintain compliance with all applicable laws regarding the collection, handling, processing, and disposal of Unwanted Medicine.
- Possess all required authorization to enter into an agreement for Program services.

## A. DEA Controlled Substances Act and Implementing Regulations

On October 12, 2010, the United States Congress enacted the Secure and Responsible Drug Disposal Act of 2010 (“Disposal Act”) as amendments to the Controlled Substances Act (“CSA”). The Disposal Act amended the CSA to allow for the expansion of entities to which users can deliver pharmaceutical controlled substances for disposal, subject to regulations to be promulgated. On September 9, 2014, the DEA adopted a rule entitled “Disposal of Controlled Substances” 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) ; 1317.70(b) (Standard 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 or clinics 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 and via Standard Mail-Back Services, 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 and Take-Back Events, and through Standard Mail-Back Services per the DEA Rule. See DEA Rule §§ 1317.75(b) (Kiosk Drop-Off Sites); 1317.65(d) (Take-Back Events); 1317.70(b) (Standard Mail-Back Services).

### 1. DEA Registration Modification

Pursuant to 21 C.F.R. § 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 DEA Rule § 1301.13(j).

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

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

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

## C. California State 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 ("CCR"). 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.

# XV. Annual Report

An annual report will be provided to the Director within six months after the end of the first twelve-month period of operation and annually thereafter. Ordinance § 4.116.090(a). This report will be provided in the format required by the Ordinance.

For the reporting period, the report will include:

A list of producers participating in the Program;

The amount, by weight, of Unwanted Medicine collected, including the amount by weight from each collection method used, including Kiosk Drop-Off Sites and Mail-Back Services (using an average weight per package/container/envelope, as provided by Vendor);

- A list of Kiosk Drop-Off Sites and Mail-Back Distribution Locations;
- The number of mailers provided, by ZIP code;
- The dates and locations of Take-Back Events;
- Transporters, treatment, and disposal facilities used;
- Whether any safety or security problems occurred during collection, transportation, treatment, or disposal of Unwanted Medicine and, if so, what changes have or will be made to policies, procedures or tracking mechanisms to alleviate the problem and improve safety and security;
- A description of public education, outreach, and evaluation activities implemented;
- A description of how collected packaging was recycled to the extent feasible, including the recycling facility or facilities used;
- A summary of the Program goals, the degree of success meeting these goals in the past year, and how these goals will be achieved in the next year if they were not met; and
- The Program's total expenditures.

# XVI. Coordination

MED-Project will coordinate with all other approved stewardship plans to meet the requirements set forth in Ordinance § 4.116.060.

MED-Project will implement a single system of promotion that uses a variety of outreach tactics, and that involves coordination with other approved stewardship plans to offer printed materials, including posters and brochures, and a single toll-free telephone number, a single website, and a single survey. This single system of promotion will be implemented pursuant to the Terms of Coordination agreed to by MED-Project and the other approved program operator on September 7, 2023. Such Terms of Coordination are attached hereto as Appendix H.

# Appendix A

## Participating Kiosk Drop-Off Sites

| Account Name | Street Address | City | Zip/Postal Code |
|---|---|---|---|
| Belmont Police Department | 1 Twin Pines Lane | Belmont | 94002 |
| Brisbane Police Department | 147 Valley Drive | Brisbane | 94005 |
| Broadmoor Police Department | 388 88th Street | Broadmoor | 94015 |
| Chinese Hospital Outpatient Center Pharmacy | 386 Gellert Boulevard, Suite A | Daly City | 94015 |
| County of San Mateo Juvenile Courthouse - Youth Services Center | 222 Paul Scannell Drive | San Mateo | 94402 |
| CVS Pharmacy 00550 | 1324 San Carlos Avenue | San Carlos | 94070 |
| CVS Pharmacy 09216 | 60 Cabrillo Highway North | Half Moon Bay | 94019 |
| CVS Pharmacy 09329 | 1039 El Camino Real | Redwood City | 94063 |
| CVS Pharmacy 09554 | 77 Bovet Road | San Mateo | 94402 |
| CVS Pharmacy 09690 | 2111 Bay Road | Redwood City | 94063 |
| CVS Pharmacy 09752 | 375 Gellert Boulevard | Daly City | 94015 |
| CVS Pharmacy 09807 | 10 Bayhill Shopping Center | San Bruno | 94066 |
| CVS Pharmacy 09811 | 1871 El Camino Real | Burlingame | 94010 |
| CVS Pharmacy 09833 | 4242 South El Camino Real | San Mateo | 94403 |
| CVS Pharmacy 09879 | 987 East Hillsdale Boulevard | Foster City | 94404 |
| CVS Pharmacy 09940 | 872 North Delaware Street | San Mateo | 94401 |
| CVS Pharmacy 09977 | 124 De Anza Boulevard | San Mateo | 94402 |
| CVS Pharmacy 10165 | 135 Pierce Street | Daly City | 94015 |
| Daly City Police Department | 333 90th Street | Daly City | 94015 |
| Drew Center Pharmacy | 2242 University Avenue | East Palo Alto | 94303 |
| East Palo Alto Police Department | 141 Demeter Street | East Palo Alto | 94303 |

| Account Name | Street Address | City | Zip/Postal Code |
|---|---|---|---|
| Half Moon Bay Pharmacy | 40 Stone Pine Road, Suite I | Half Moon Bay | 94019 |
| Hillsborough Police Department | 1600 Floribunda Avenue | Hillsborough | 94010 |
| Kaiser Daly City 1Fl OP Pharmacy 341 | 395 Hickey Boulevard 1st Fl | Daly City | 94015 |
| Kaiser Redwood City Marshall MOB OP Pharmacy 370 | 905 Maple Street,FL 1 RM 1250 | Redwood City | 94063 |
| Kaiser Redwood Cypress MOB Pharmacy 371 | 1150 Veterans Blvd | Redwood City | 94063 |
| Kaiser S SF Main Pharmacy 351 | 1200 El Camino Real | South San Francisco | 94080 |
| Kaiser San Bruno Bayhill Pharmacy 353 | 801 Traeger Avenue | San Bruno | 94066 |
| Kaiser San Bruno OP 357 | 901 El Camino Real | San Bruno | 94066 |
| Kaiser San Mateo MOB Pharmacy 339 | 1000 Franklin Parkway Fl1 | San Mateo | 94403 |
| Menlo Park Police Department | 701 Laurel Street | Menlo Park | 94025 |
| North East Medical Services (NEMS)Eastmoor Pharmacy | 211 Eastmoor Avenue | Daly City | 94015 |
| Pacifica Police Department | 2075 Coast Highway | Pacifica | 94044 |
| Redwood City Police Department | 1301 Maple Street | Redwood City | 94063 |
| Rite Aid 05885 | 170 San Mateo Road | Half Moon Bay | 94019 |
| Rite Aid 05890 | 1400 Linda Mar Shopping Center | Pacifica | 94044 |
| Rite Aid 05891 | 200 Fairmont Shopping Center | Pacifica | 94044 |
| Rite Aid 05892 | 340 Woodside Plaza | Redwood City | 94061 |
| Rite Aid 05893 | 2150 Roosevelt Avenue | Redwood City | 94061 |
| San Bruno Police Department | 1177 Huntington Avenue East | San Bruno | 94066 |
| San Mateo County Health - San Mateo Medical Center | 222 West 39th Avenue, Room 121 | San Mateo | 94403 |

| Account Name | Street Address | City | Zip/Postal Code |
|---|---|---|---|
| San Mateo County Sheriff's Office | 400 County Center, 3rd Floor | Redwood City | 94063 |
| San Mateo County Sheriff's Office - Coastside Patrol Bureau | 500 California Avenue | Moss Beach | 94038 |
| San Mateo County Sheriff's Office - Half Moon Bay Sheriff's Office Substation | 537 Kelly Avenue | Half Moon Bay | 94019 |
| San Mateo County Sheriff's Office - Millbrae Police Bureau | 581 Magnolia Avenue | Millbrae | 94030 |
| San Mateo County Sheriff's Office - San Carlos Patrol Bureau | 600 Elm Street | San Carlos | 94070 |
| San Mateo Police Department | 200 Franklin Parkway | San Mateo | 94403 |
| South San Francisco Police Department | 1 Chestnut Avenue | South San Francisco | 94080 |
| Sunshine Center Pharmacy | 1166 Mission Road | South San Francisco | 94080 |

## Mail-Back Distribution Location

| Account Name | Street Address | City | Zip/Postal Code |
|---|---|---|---|
| Coastside Fire Protection District Station 40 | 1191 Main Street | Half Moon Bay | 94019 |
| Coastside Fire Protection District Station 41 | 555 Obispo Road | El Granada | 94018 |
| Coastside Fire Protection District Station 44 | 501 Stetson Street | Moss Beach | 94038 |
| Hometown Healthcare | 3 Portola Road | Portola Valley | 94028 |
| Kings Mountain Fire Department | 13889 Skyline Blvd | Woodside | 94062 |
| La Honda Fire Brigade | 8945 La Honda Road | La Honda | 94020 |
| San Mateo County Fire Department-Loma Mar | 8879 Pescadero Creek Road | Pescadero | 94021 |
| San Mateo County Fire Skylonda Station 58 | 17290 Skyline Boulevard | Woodside | 94062 |

| Account Name | Street Address | City | Zip/Postal Code |
|---|---|---|---|
| San Mateo County Fire Station 59 | 1200 Pescadero Creek Road | Pescadero | 94060 |
| US Post Office San Gregorio | 7615 Stage Road | San Gregorio | 94074 |

# Appendix B

## Sample Kiosk and Signage

## Sample Kiosk Signage

Front Panel Kiosk Art

## Sample Kiosk Signage

Side Panel Kiosk Art


MED-Project™
Medication Education & Disposal

## Sample Kiosk Signage

Drop-Slot Kiosk Art


Name: 123 Pharmacy

Contact: (555) 555-5555

USA.KA.01.000011A.ALL.01.01.45.02.00

# Appendix C

## Medical Waste Incineration Petition

### MED-PROJECT REQUEST FOR APPROVAL OF DISPOSAL OF UNWANTED MEDICINE FROM KIOSK SITES AND IN MAIL-BACK PACKAGES AT TWO MEDICAL WASTE INCINERATORS

Pursuant to § 4.116.110(c) of the County of San Mateo Safe Medicine Disposal Ordinance, Ordinance No. 04636, codified at Chapter 4.116 of Title 4 of the San Mateo County Ordinance Code ("Ordinance"), MED-Project LLC ("MED-Project") requests approval from the Director of the Environmental Health Division (the "Director") to use two medical waste incinerators, the Stericycle Warren, Ohio facility and the Curtis Bay Energy, LP Baltimore, Maryland facility for the disposal of unwanted medicine collected through Kiosk Drop-Off Sites and through Mail-Back Packages (as defined in the MED-Project Product Stewardship Plan ("Plan") § III). As described below, the Director should approve the disposal of unwanted medicines collected at Kiosk Drop-Off Sites and through Mail-Back Packages at these two medical waste incinerators because they provide equivalent protection at a lesser cost when compared to what is provided by a permitted hazardous waste disposal facility or a permitted large municipal waste combustor.

Further, the Director should exercise discretion to allow for the disposal of unwanted medicine from Kiosk Drop-Off Sites and Mail-Back Packages at these two medical waste incinerators because such disposal would achieve the objectives of the Ordinance in accordance with § 4.116.110(f) of the Ordinance, which include protecting the environment and human health.

#### I. MED-PROJECT COLLECTION OF UNWANTED MEDICINES IN KIOSKS AND MAIL BACK PACKAGES

Under the MED-Project Plan, MED-Project will collect for disposal containers and inner liners for host-assisted Kiosk Drop-Off Sites and technician-assisted Kiosk Drop-Off Sites. This request for approval addresses the disposal of these containers and inner liners at two medical waste incinerators. All of the relevant containers from kiosks will be pre-addressed and pre-paid for shipment to one of these two medical waste incinerators. The two medical waste incinerators will scan the unique identifier on each container to record receipt of the container before incinerating it, and will confirm the materials have been properly incinerated.

In addition, under the MED-Project Plan, some standard mail back packages, injector mail back packages and inhaler mail back pages will be disposed at the two medical waste incinerators. Such mail back packages will be pre-addressed and pre-paid for delivery to one of the two medical waste incinerators. The two medical waste incinerators will scan the unique identifier on each mail back package to record receipt of the package before incinerating it, and will confirm the materials have been properly incinerated.

#### II. THE WARREN, OHIO AND THE CURTIS BAY ENERGY LP BALTIMORE, MARYLAND MEDICAL WASTE INCINERATORS

A. <u>The Warren, Ohio Incinerator</u>

The Warren, Ohio incinerator ("Warren incinerator") is a permitted hospital, medical, and infectious waste incinerator. The incinerator's primary chamber has a minimum exit gas temperature of 1400 ºF, and the incinerator's secondary chamber is operated at over 1,830.5 ºF.

The Warren incinerator also has a Clean Air Act Title V permit, which establishes air emissions limits for particulate matter, carbon monoxide, dioxins/furans, hydrogen chloride, sulfur dioxide, nitrogen oxides, lead, cadmium, and mercury, among other chemicals.[5] To control air pollution, the Warren incinerator employs a carbon bed system, continuous emissions monitoring systems, a selective non-catalytic reduction system, and a scrubber system, among other controls. The incinerator stack(s) must be designed to minimize the impact of emissions on employees, residents, visitors, and nearby residences.

B. Curtis Bay Incinerator

The Curtis Bay Energy, LP incinerator located in Baltimore, Maryland ("Curtis Bay incinerator") is a permitted hospital, medical, and infectious waste incinerator. The Curtis Bay incinerator operates two incineration units that are permitted to incinerate a maximum of 150 tons of waste per day for the facility. The Curtis Bay incinerator operates under a Clean Air Act Title V permit and is subject to emissions limits for a number of air pollutants in accordance with this permit. To control air pollution, the incinerator employs a tertiary combustion chamber, a dry injection acid gas scrubber, a powder activated carbon system, and a fabric filter with passive dioxins/furans emissions control.[6] The facility relies on a continuous opacity monitoring system and a continuous emission monitoring system for monitoring carbon monoxide, oxygen, and hydrogen chloride content levels of the stack exhaust gases.[7] The Curtis Bay Facility also operates under an Industrial Wastewater Discharge Permit and Solid Waste Permit.

## III. THE USE OF THE WARREN INCINERATOR AND THE CURTIS BAY INCINERATOR TO DISPOSE OF UNWANTED MEDICINES COLLECTED AT KIOSK DROP-OFF SITES AND IN MAIL-BACK PACKAGES SHOULD BE APPROVED UNDER ORDINANCE § 4.116.070(C)

§ 4.116.070(c) of the Ordinance provides for the approval of final disposal technologies that provide (1) superior environmental and human health protection when compared to hazardous waste or municipal waste incinerators, or (2) equivalent protection at a lesser cost. The Ordinance adds that facilities approved under § 4.116.070(c) must provide equivalent or superior protection in each of the following areas: (1) monitoring of any emissions waste; (2) worker health and safety; (3) reduction or elimination of air, water or land emissions contributing to persistent, bioaccumulative, and toxic pollution; and (4) overall impact on the environment and human health.

First, MED-Project requests approval to use the Warren and Curtis Bay medical waste incinerators because they provide equivalent protection at a lesser cost when compared to hazardous waste and municipal waste incinerators. Disposal of materials collected by MED-Project at Kiosk Drop-Off Sites and in Mail-Back Packages at the Warren incinerator and the Curtis Bay incinerator would provide for and protect the health, safety, and welfare of the general public. These medical waste incinerators are subject to stringent United States Environmental Protection Agency environmental requirements, as well as worker health and safety standards like other incinerators. The Warren and Curtis Bay incinerators are subject to environmental permits, including Clean Air Act Title V permits for air emissions and state solid

[5] This information is drawn from the Stericycle Warren Ohio Title V permit # P0128242
[6] This information is drawn from the Curtis Bay incinerator's Title V permit #24-510-2975
[7] Id.

waste management permits, and, they have extensive air pollution controls in place. Additionally, facilities that handle medical waste, like these two medical waste incinerators, are subject to a suite of worker health and safety standards. These requirements typically range from the use of personal protective equipment to specific handling and containment procedures. For the above reasons, MED-Project contends that the Warren and Curtis Bay incinerators provide equivalent environmental protection.

Second, MED-Project requests approval of the Warren and Curtis Bay medical waste incinerators because the equivalent environmental protection they provide is furnished at lesser cost. The cost to dispose of unwanted medicine at medical waste incinerators is far less than the cost to dispose of unwanted medicine at hazardous waste incinerators. In MED-Project's experience, hazardous waste incinerators typically charge significantly more than other incinerators to dispose of the same quantity of waste. Compliance, logistical feasibility, cost, and other considerations typically drive how MED-Project and its vendors select disposal facilities, and MED-Project appreciates the flexibility to respond to those factors and others as it operates its program with a variety of disposal options.

In conjunction with this petition, MED-Project is providing the Department with a May 16, 2022 memorandum prepared by ERM (the "ERM Memorandum") at the request of MED-Project, which provides a comprehensive comparison of different disposal facility technologies, including hazardous waste incinerators, medical waste incinerators, and municipal waste combustors. The ERM Memorandum confirms MED-Project's experience regarding costs noted above, *i.e.*, that hazardous waste incinerators charge more than medical waste incinerators. The ERM Memorandum also demonstrates that medical waste incinerators provide at a minimum equivalent environmental protection when compared to hazardous waste incinerators and municipal waste incinerators, including in the four categories required by § 4.116.110(c): monitoring of any emissions or waste; worker health and safety; reduction or elimination of air, water or land emissions contributing to persistent, bioaccumulative, and toxic pollution; and overall impact on the environment and human health. *See* May 16, 2022 ERM Review of Select Municipal Waste Combustors, Medical Waste Incinerators, and Hazardous Waste Incinerators Report.

## IV. THE DIRECTOR SHOULD EXERCISE THEIR REASONABLE DISCRETION AND APPROVE THE USE OF THE WARREN AND CURTIS BAY INCINERATORS UNDER ORDINANCE § 4.116.110(F) BECAUSE DISPOSAL AT THESE FACILITIES WOULD PROTECT THE ENVIRONMENT AND HUMAN HEALTH IN FURTHERANCE OF THE OBJECTIVES OF THE ORDINANCE.

The Warren and Curtis Bay incinerators, as medical waste incinerators, are subject to stringent environmental requirements, as well as worker health and safety standards like other incinerators. They are subject to a range of environmental permits, including under Clean Air Act Title V, and solid waste management permits. They employ extensive air pollution controls and monitoring systems. Additionally, incinerators that manage medical waste, like Warren and Curtis Bay, are subject to a suite of worker health and safety standards. These requirements range from the use of personal protective equipment to specific handling and containment procedures.

As these applicable requirements and measures protect the environment and human health, the Director should exercise their discretion Final to approve use of the Warren and Curtis Bay medical waste incinerators under § 4.116.110(f) because the disposal of unwanted medicines at these medical waste incinerators would protect the environment and human health in furtherance of the objectives of the Ordinance.

## V. CONCLUSION

Accordingly, the Director should approve the disposal of unwanted medicines collected by MED-Project from Kiosk Drop-Off Sites and in Mail Back Packages at the Warren and Curtis Bay medical waste incinerators under Ordinance §§ 4.116.070(c) and 4.116.110(f).

# May 16, 2022, ERM Combined Incinerator Memo Final

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|---|---|
| **Date** | 16 May 2022 |
| **Client** | Jim Wilson, P.E.<br>Lead Director, Legal and Compliance<br>Med-Project |
| **Reference** | Project No. 0572758 |
| **Subject** | ERM Review of Select Municipal Waste Combustors, Medical Waste Incinerators, and Hazardous Waste Incinerators |

## INTRODUCTION

ERM was contracted by MED-Project to complete a comparison of incineration technologies at eight facilities across six different factors: cost, logistics, monitoring of any emissions or waste, worker health and safety, reduction or elimination of air, water, or land emissions contributing to persistent, bio-accumulative, and toxic pollution, and overall impact on the environment and human health. The facilities included in this comparison are:

- Stericycle, a Hospital Medical Infectious Waste Incinerator (HMIWI) located in Warren, Ohio with one unit that has a maximum waste material feed rate of 6,720 tons per year[1];
- Covanta Indianapolis, a municipal waste combustor, located in Indianapolis, Indiana with three units that have a design capacity of 264,990 tons per year of municipal solid waste per unit[1];
- Covanta Lancaster, a municipal waste combustor, located in Lancaster, Pennsylvania with three units that can process up to 146,000 tons per year of municipal solid waste per unit[1];
- Covanta York, a municipal waste combustor, located in York, Pennsylvania with three units that can process up to a combined 490,560 tons per year of municipal solid waste[1];
- Heritage Environmental, a hazardous waste combustor located in East Liverpool, Ohio with one incineration unit that can treat a total of 88,000 tons per year of hazardous waste[1];
- Ross Incineration, a hazardous waste combustor located in Elyria, Ohio with one incineration unit that has a total maximum waste feed rate of 114,130 tons per year[1];
- Clean Harbors Aragonite, a hazardous waste combustor located in Dugway, Utah with one incineration unit that has a current permitted capacity of approximately 113,880 tons per year[1]; and
- Veolia Port Arthur, a hazardous waste combustor located in Port Arthur, Texas with one incineration unit that is permitted to handle up to 150,000 tons per year[1].

[1] Information available from publicly available websites.

A tabular format of the comparison is also included, attached to this memo in Appendix A.

## COST

Stericycle indicated that the cost of medical waste incineration is averaging 2.8 times per pound lower than hazardous waste incineration[2]. Municipal waste combustion is estimated to be 4 to 7 times less expensive than hazardous waste incineration on the east coast[3].

## LOGISTICS

All eight facilities accept Drug Enforcement Administration (DEA) controlled substances and non-RCRA pharmaceutical wastes collected at secure kiosks. Additionally, all of the facilities have indicated that there are no other limitations or prohibitions on specific medicine that they can handle.

Reverse distributed unwanted medicine boxes and liners must be sent to a DEA registered reverse distributor site before transfer to a destruction facility. For the purpose of this memo, it was assumed that all boxes and liners would be sent from San Francisco to the DEA registered reverse distributor site in Warren, Ohio before being sent to one of the eight destruction facilities. The Warren reverse distributor site is approximately 2,600 miles away from the San Francisco area; this mileage is accounted for in the greenhouse gas (GHG) calculations for all eight sites in the table in Appendix A.

The closest destruction facility is located in Warren, Ohio at the same location as the reverse distributor. The other seven facilities are located between 50 and 1,900 miles from the Warren, Ohio reverse distributor site, with the next closest facility, Heritage Environmental, being approximately 51 miles away and the furthest facility, Clean Harbors Aragonite, being approximately 1,835 miles away. Assuming diesel trucks are used to ship the waste, a Greenhouse Gas (GHG) emission factor of 3.64 pounds per mile travelled per vehicle, based on 2019 data from the EPA SmartWays Carrier Performance Rankings, was used to estimate GHG emissions associated with travel to each facility. Transportation to Stericycle Warren, the closest facility, would emit approximately 4.73 tons of $CO_2e$ per one-way trip per vehicle.

Since as early as June 2021, many commercial hazardous waste incinerators have been unable to accept additional containerized hazardous waste designated for incineration due to a backlog at their facilities. This backlog has been caused by a number of factors, including labor shortages due to the COVID-19 pandemic, scheduled and unscheduled shutdowns due to maintenance and weather, and increased manufacturing and waste generation as the economy ramps up after the pandemic. EPA became aware of this problem and issued a memo titled "Regulatory Options for Addressing the Temporary Backlog of Containerized Hazardous Waste Needing Incineration" on August 10, 2021. A copy of this memo is included in Appendix D. Based on information collected by the EPA, the memo indicated that the backlog may not be fully resolved until the end of the first quarter of 2022.

Because of the backlog at hazardous waste incinerators and resulting extended storage requirements, it may be prudent for generators of non-hazardous wastes, which includes non-RCRA pharmaceuticals and non-hazardous DEA controlled substances, to avoid using hazardous waste incinerators. Facilities like municipal waste combustors and HMIWIs offer similar handling treatments for non-hazardous waste without adding to the backlog.

[2]Information provided in Stericycle draft letter to San Francisco Environment dated October 5, 2020.

[3]Information provided by Covanta in email dated January 27, 2021 to MED-Project at MED-Project's request.

## MONITORING OF ANY EMISSIONS OR WASTE

### Air Emissions

Stericycle utilizes a selective non-catalytic reduction system (SNCR), condensing absorber scrubber, venturi scrubber, mist eliminator, and carbon bed adsorber to reduce air emissions. Stericycle did not provide a destruction and removal efficiency (DRE) of their combustion unit, as DRE is a measure relevant for the destruction of hazardous constituents, which is not applicable to their facility[2].

The air pollution control equipment at Covanta Indianapolis includes the SNCR, a spray dry absorber, fabric filter, mercury emission control system, and a dustmaster conditioning system. Covanta Indianapolis indicated that their combustion process has a 99.9% destruction of pharmaceuticals and personal care products, but did not provide the method of calculation or a measure of DRE for their combustion units[4].

Covanta Lancaster uses a dry lime injection system, SNCR, activated carbon system, dry scrubber, and a baghouse to reduce air emissions. Air pollution control equipment at Covanta York includes a lime spray dryer absorber, a fabric filter, and an activated carbon injection system on each incinerator unit. Neither Covanta Lancaster nor Covanta York provided a measure of DRE for their combustion units. Similar to the Stericycle operation, none of the three Covanta facilities handles hazardous waste at their facility and DRE is not applicable per regulatory requirements[5].

Emission control equipment used at Heritage Environmental includes an electrostatic precipitator, 4-stage wet scrubber, carbon injection system, and a spray dryer. The Heritage incinerator demonstrated a destruction and removal efficiency of 99.9999% using EPA Method 3000 during a performance test conducted in March 2020[6].

Ross Incineration uses a cyclone separator, radial flow scrubber, gas-liquid contactor, and two electrostatic precipitators as part of their air pollution control equipment. The air permit held by Ross Incineration requires a 99.99% destruction and removal efficiency for each principal organic hazardous constituent. The permit requires a one-time DRE test and only requires a retest if the combustion system is modified such that the DRE could be impacted. Ross Incineration did not provide a tested destruction and removal efficiency of their combustion unit nor a method used for calculation[5].

Clean Harbors Aragonite uses a spray dryer, baghouse, saturator, and wet scrubber to reduce air emissions from the incinerator. Based on information provided by Clean Harbors Aragonite, the incinerator demonstrated a 99.99999% DRE using SW-846 Method 0023A to sample train and SW-846 Method 8270 to analyze during its most recent performance test[5].

Veolia Port Arthur control equipment includes a wet scrubber and wet electrostatic precipitator. A minimum of 99.99% DRE for organic hazardous constituents and 99.8% DRE for hydrogen chloride is required for the incinerator[5].

The Table 1 below lists emission rates at each facility based on most recent actual test results of the incinerators at Stericycle, Covanta Indianapolis, Covanta Lancaster, Covanta York, and

[4] Information provided from Covanta Indianapolis Title V permit dated November 4, 2019.

[5] Information publically available on facility websites.

[6] Information based on publically available documents in Ohio EPA's eDocument Search.

Heritage Environmental. Ross Incineration did not provide actual emission rates for their facility. Table 2 lists the pollutant limitations for all eight facilities.

Table 1. Actual Emission Rates of Select Pollutants at Each Facility

| Pollutant, units | Stericycle[7] | Covanta Indianapolis[8] | Covanta Lancaster[8] | Covanta York[8] | Heritage[5] | Ross Incineration | Clean Harbors Aragonite[9] | Veolia Port Arthur[9] |
|---|---|---|---|---|---|---|---|---|
| Particulate, grains/dscf | 0.0012 | 0.0027 | 0.0002 | 0.0003 | 0.001 | Actual emission rates not provided. See Table 2 for pollutant limits. | 0.0022 | NA |
| Particulate, tpy | NA | NA | NA | NA | NA | | NA | 0.6084 |
| Nitrogen Oxides, ppmv | 117.7 | 143 | 142.3 | 119.3 | NA | | NA | NA |
| Nitrogen Oxides, tpy | NA | NA | NA | NA | 72.96 | | 108.07 | 107.23 |
| Carbon Monoxide, ppmv | 0.4 | 44.3 | 10.4 | 55.7 | 11 | | 42.18 | NA |
| Carbon Monoxide, tpy | NA | NA | NA | NA | NA | | NA | 0.6891 |
| Sulfur Dioxide, ppmv | 0.12 | 8.7 | 0.7 | 14.3 | NA | | 11.35 | 0.25 |
| Sulfur Dioxide, tpy | NA | NA | NA | NA | 4.99 | | 20.63 | 1.3271 |
| Hydrogen Chloride, ppmv | 0.0599 | 8.3 | 1.3 | 1.0 | 0.13 | | 1.8 | NA |
| Hydrogen Chloride, tpy | NA | NA | NA | NA | NA | | NA | 0.9080 |
| Cadmium, mg/dscm | 0.0002 | 0.0012 | 0.0002 | 0.0002 | 0.014 | | 0.092 | NA |
| Lead, mg/dscm | 0.0019 | 0.0101 | 0.0031 | 0.0025 | | | | |
| Cadmium & Lead, tpy | NA | NA | NA | NA | NA | | NA | 0.0025 |
| Mercury, mg/dscm | 0.0029 | 0.0007 | 0.0004 | 0.0008 | 0.014 | | 0.046 | NA |
| Mercury, tpy | NA | NA | NA | NA | NA | | NA | 0.0145 |
| Total Dioxins/Furans, ng/dscm | 0.0772 | 1.4 | 0.5 | 1.3 | 0.03 | | 0.0069 | 0.099 |
| TEQ Dioxins/Furans, ng/dscm | 0.001 | Not Provided | Not Provided | Not Provided | 0.03 | | 0.0069 | 0.0077 |

[7] Information provided in draft Stericycle letter to San Francisco Environment dated October 5, 2020.

[8] Information provided by Covanta in email dated December 3, 2020 to MED-Project at MED-Project's request.

[9] Information provided by MED-Project in a spreadsheet dated December 21, 2021.

Table 2. Select Pollutant Limitations for Each Facility

| Pollutant, units | Stericycle [10] | Covanta Indianapolis [11] | Covanta Lancaster [12] | Covanta York [13] | Heritage [14] | Ross Incineration [15] | Clean Harbors Aragonite [16] | Veolia Port Arthur [16] |
|---|---|---|---|---|---|---|---|---|
| Particulate, grains/dscf | 0.011 | 0.011 | 0.01 | 0.010 | 0.013 | 0.013 | 0.013 | 0.013 |
| Nitrogen Oxides, ppmv | 140 | 205 | 135 | 135 | NA | NA | NA | NA |
| Nitrogen Oxides, tpy | NA | NA | 249 | NA | 124.23 | 218.5 | 193.5 | NA |
| Carbon Monoxide, ppmv | 11 | 100 | 100 | 100 | 100 | 100 | 100 | 100 |
| Sulfur Dioxide, ppmv | 9.0 | 29 | 30 | 29 | NA | NA | 91 | NA |
| Sulfur Dioxide, tpy | NA | NA | 116 | NA | 49.67 | 66.14 | NA | NA |
| Hydrogen Chloride, ppmv | 6.6 | 29 | 25 | 25 | 32 | 32 | 32 | 32 |
| Cadmium, mg/dscm | 0.0092 | 0.035 | 0.0158 | 0.0158 | 0.23 | 0.23 | 0.23 | 0.23 |
| Lead, mg/dscm | 0.036 | 0.400 | 0.166 | 0.166 | | | | |
| Mercury, mg/dscm | 0.018 | 0.050 | 0.080 | 0.050 | 0.13 | 0.13 | 0.13 | 0.13 |
| Total Dioxins/ Furans, ng/dscm | 9.3 | 30 | 13 | 30 | NA | NA | 0.40 | NA |
| TEQ Dioxins/ Furans, ng/dscm | 0.054 | NA | NA | NA | 0.20 | 0.40 | 0.40 | 0.40 |

[10] Information provided in draft Stericycle letter to San Francisco Environment dated October 5, 2020.
[11] Information provided from Covanta Indianapolis Title V permit dated November 4, 2019.
[12] Information provided from Covanta Lancaster Title V permit dated December 17, 2017.
[13] Information provided from Covanta York Title V dated December 23, 2016.
[14] Information provided from Heritage Title V permit dated October 16, 2020.
[15] Information provided from Ross Incinerator Title V permit dated January 3, 2019.
[16] Information provided by MED-Project in a spreadsheet dated December 21, 2021.

## Waste Generated

Ash generated at each facility is managed via landfilling.

Ash generated at Stericycle is sent to a non-hazardous (Subtitle D) landfill. Ash is sampled and analyzed quarterly for metals to ensure that it meets all governing regulations (e.g., does not exhibit a hazardous waste characteristic). On average, Stericycle produces approximately 1,300 tons of ash per year[17].

Covanta Indianapolis uses advanced magnets and eddy current separators to remove ferrous and non-ferrous metals from the ash prior to disposal. Approximately one-third of the ash generated at Covanta Indianapolis is sent to a municipal solid waste landfill, where it is used as daily cover. The remaining ash is sent to an ash monofill, which is a non-hazardous landfill that contains only ash. Based on current operations, the amount of ash generated is equal to about 25% of the weight of the initial waste[18].

At Covanta Lancaster, ferrous and non-ferrous materials are removed from the ash generated and recycled. The remaining ash is then taken to a nearby non-hazardous landfill and used as daily cover. Ash generated is equal to approximately 10% of the initial waste volume[18].

Ash generated at Covanta York is sent next door to the Ash Recycling and Processing Facility (ARPF) for furthering processing. The ARPF uses a wet separation technology to increase the recovery of recyclable materials, including aggregates, metals, and sand from the ash. Any ash remaining after processing at the ARPF is managed at a landfill. Approximately 10% of the initial waste volume remains as ash for landfilling[18].

Heritage Environmental generates waste salt and slag that is landfilled in a hazardous waste landfill. In 2019, the Heritage Environmental incinerator generated just over 18,000 tons of residuals that were disposed in an offsite hazardous waste landfill. The most recent biennial waste report from 2017 indicates that Heritage Environmental received approximately 53,700 tons of waste; the amount of ash generated is equal to about 33.5% of the weight of the initial waste received[18].

Ross Incineration chemically solidifies the ash generated from the incinerator to bind metals into a concrete-like substance and then the solidified ash is disposed in an offsite hazardous waste landfill. No information was provided on the amount of residuals generated at Ross Incineration[18].

Clean Harbors Aragonite and Veolia Port Arthur both send generated ash for landfilling at Subtitle C RCRA landfills. Clean Harbors Aragonite generated 20,074 tons of waste in 2020[19]. Veolia Port Arthur generated 2,100 tons of waste, including residuals that were shipped offsite[19].

Water Emissions

Stericycle has onsite wastewater pretreatment, which includes a series of settling and separation tanks and filters. The pretreated wastewater is then discharged to a Publicly

[17] Information provided in draft Stericycle letter to San Francisco Environment dated October 5, 2020.

[18] Information provided from publically available websites.

[19] Information provided by MED-Project in a spreadsheet dated December 21, 2021.

Operated Treatment Works (POTW). Stericycle holds a permit with the POTW to discharge the pretreated wastewater. Any wastewater sludge generated is subject to metal testing and is sent to a landfill for disposal. On average, Stericycle produces approximately 48 tons of wastewater sludge annually[22].

Sewage sludge is generated at Veolia Port Arthur from an onsite wastewater treatment plant that treats domestic sewage generated onsite, unrelated to the hazardous waste operations. The generated sludge is sent offsite; approximately 92 tons of wastewater sludge is produced annually.

The six remaining facilities, Covanta Indianapolis, Covanta Lancaster, Covanta York, Heritage Environmental, Ross Incineration and Clean Harbors Aragonite indicated that they do not discharge any wastewater during their operations.

## WORKER HEALTH AND SAFETY

OSHA 300 logs for the past three years were provided for review for Stericycle, Covanta Indianapolis, Covanta Lancaster, Covanta York, and Heritage Environmental[20]. Ross Incineration, Clean Harbors Aragonite, and Veolia Port Arthur did not provide OSHA 300 logs for review.

Stericycle had four recordable injuries between 2017 and 2018, with no recordable injuries in 2019. Covanta Indianapolis had two recordable injuries in 2017, with no recordable injuries in 2018 and 2019. Covanta Lancaster had no record injuries between 2017 and 2019. Covanta York had no recordable injuries in 2017 and 2019, with two recordable injuries in 2018. Heritage Environmental had eight recordable injuries over the past three years. The provided OSHA 300 logs are attached to this memo in Appendix B.

Covanta Indianapolis, Covanta Lancaster, Covanta York, Clean Harbors Aragonite, and Veolia Port Arthur all participate in the OSHA voluntary participation program (VPP); Covanta Indianapolis is part of the Indiana state VPP, while the other facilities participate at the federal level[21]. The results of the most recent self-audit were not provided for any of the facilities.

## REDUCTION OR ELIMINATION OF AIR, WATER, OR LAND EMISSIONS CONTRIBUTING TO PERSISTENT, BIO-ACCUMULATIVE, AND TOXIC (PBT) POLLUTION AND OVERALL IMPACT ON THE ENVIRONMENT AND HUMAN HEALTH

Metrics identified to quantify the reduction or elimination of air, water, or land emissions contributing to PBT pollution include the Toxic Release Inventory (TRI) reporting results from the four approved and proposed facilities that completed TRI reporting for the past three years. EPA's Risk Screening Environmental Indicators (RSEI) scores for the past three years were compiled for the four approved and proposed facilities that complete TRI reporting as an indicator of the overall impact on the environment and human health. Neither Stericycle, Covanta Indianapolis, Covanta Lancaster, nor Covanta York completed TRI reporting for the previous three years, based on a review of the EPA's TRI databases[21].

[20] OSHA 300 logs for Stericycle and Heritage provided in email dated November 12, 2020 to MED-Project at MED-Project's request OSHA 300 logs for Covanta facilities provided in emails dated November 5 and December 3, 2020 to MED-Project at MED-Project's request.

[21] Information from publicly available websites.

For the approved and proposed facilities that do not complete TRI reporting and do not have a RSEI score, alternative evaluation metrics for reduction or elimination of air, water or land emissions contributing to PBT pollution and overall impact on the environment and human health are required. In accordance with the April 30, 2021, request for additional information from the San Francisco Department of the Environment, a review of the underlying federal and state regulatory emission limits utilized as a basis for permitting of different types of Waste Incinerators/Combustors was performed in an effort to compare the level of emission control required for air emissions. This evaluation can be utilized as a relative assessment of operational requirements to control emission of certain regulated persistent, bio-accumulative, and toxic (PBT) constituents from each facility type, as well as represent overall impact on the environment and human health.

## Toxic Release Inventory Reporting Results

As mentioned above, four of the eight facilities discussed in this memo do not complete TRI reporting.

The Stericycle facility has determined that it is not subject to TRI reporting, as it does not meet the required reporting criteria. Stericycle states that it does not manufacture, process, or use any chemicals that are found on the TRI List of Chemicals. Additionally, Stericycle's NAISC code (562213) only triggers TRI reporting for facilities that either take hazardous waste or are RCRA Subtitle C facilities, neither of which criteria applies to Stericycle.[22] Covanta did not provide information regarding the applicability of TRI reporting for any of its three facilities.

Ross Incineration, Heritage Environmental, Clean Harbors Aragonite, and Veolia Port Arthur reported releases of nine different PBT chemicals and four different PBT chemical categories from their respective facilities between 2017 and 2019[21].

## Risk-Screening Environmental Indicators

EPA's Risk-Screening Environmental Indicators (RSEI) utilizes information from TRI data to determine a numeric score representing a potential for chronic human health risk. These RSEI can be used as a factor for determining overall impact on the environment and human health. Four of the facilities included in this memo, Stericycle, Covanta Indianapolis, Covanta Lancaster and Covanta York do not report for TRI and therefore, do not have a RSEI score[21]. Veolia Port Arthur had the highest RSEI score of the facilities that do report for TRI for all three years between 2017 and 2019. RSEI scores for the TRI reporting facilities are listed in Appendix A.

## Permit Review Methodology

For the approved and permitted facilities that do not complete TRI reporting and therefore do not have an RSEI score, a review of the air permitting at each type of facility was completed as an alternative to quantify reduction or elimination of emissions contributing to PBT pollution and as an indicator of overall impact on the environment and human health.

The review utilized three permits as representative examples of each of the three types of facilities presented in ERM's prior comparison dated March 8, 2021. This included Hospital Medical Infectious Waste Incinerators (HMIWI) [40 CFR Part 62, Subpart HHH], Hazardous Waste Incinerators [40 CFR Part 61, Subpart C; 40 CFR Part 63, Subpart EEE, and Ohio State Regulations from Ohio Administrative Code (OAC) 3745-31-05(A)(3)] and Large

[22] Information provided in draft Stericycle letter to San Francisco Environment dated October 5, 2020.

Municipal Waste Combustors [40 CFR Part 60 Subpart Eb and Pennsylvania Code 25 Pa. Code §127.441. Each type of facility evaluated is subject to Federal emission standards which provide a ceiling for operational emissions. Because these standards are applied across the facility type, relative comparison of the required emission limitation requirements of a representative facility within each type can be used to assess the control of certain types of PBT emissions for each overall type group.

The HMIWI emission limits reviewed were for the Large HMIWI (N001, Incinerator) under 40 CFR Part 62 Subpart HHH at the Stericycle Inc. facility in Ohio (Facility ID: 0278080634; Permit Number: P0128242).

The Hazardous Waste Incinerator (N001, Hazardous Waste Incinerator) emission limits reviewed were for the Heritage Thermal Services facility in Ohio (Facility ID: 0215020233; Permit Number: P0128768). The facility is regulated under 40 CFR Part 63, Subpart EEE as an existing source; under 40 CFR Part 61, Subpart C; and also, under (OAC) 3745-31-05(A)(3). These limits provide the regulatory required floor for operations of the facility. Additional facility specific operational requirements established during performance testing also are used in compliance.

The Municipal Waste Combustor emission limits reviewed for the Lancaster County Solid Waste Management Authority Susquehanna Resource Management Complex facility in Pennsylvania (Title V Permit No: 22-05007). This is a large category existing facility which operates under 40 CFR Part 60 Subpart Eb (For affected facilities that commenced construction, modification, or re-construction after September 20, 1994, and on or before December 19, 2005) and also under Pennsylvania Code 25 Pa. Code §127.441.

## Regulatory Emission Limit Comparison

A short summary of the emission limits comparison is shown in the following table with the most stringent regulatory emission rates highlighted in red; a more detailed summary is provided in Appendix C.

Table 3. Regulatory Emission Limits for each type of Facility

| Incinerator Category | | HMIWI | Hazardous Waste Incinerator | Municipal Waste Combustor |
|---|---|---|---|---|
| **Construction Date** | | On or before December 1, 2008 | | Constructed commenced after September 20, 1994 or modified or reconstructed after June 19, 1996 |
| **Sub-Category**** | | Large | Existing Sources | Facilities that commenced construction, modification, or reconstruction after September 20, 1994, and on or before December 19, 2005 |
| **Air Emission Rates of Selected Pollutants** | Particulate, mg/dscm | 25 | 29.75 | 24 |
| | Carbon Monoxide[3], ppmv | 11 | 100 | 100 |
| | Dioxins/furans, ng/dscm total dioxins/furans (ng/dscm TEQ) | 9.3 (0.054) | --(0.2) | 13-- |
| | Hydrogen chloride[4], ppmv | 6.6 | 32 | 25 |
| | Sulfur Dioxide, ppmv | 9 | 11.34 (lb/hr) | 30 |
| | Nitrogen Oxides, ppmv | 140 | 28.36 (lb/hr) | 135[5] |
| | Lead[1], mg/dscm | 0.036 | 0.23 | 0.166 |
| | Cadmium[1], mg/dscm | 0.0092 | | 0.0158 |
| | Mercury, mg/dscm | 0.018 | 0.13 | 0.08 |
| | Beryllium, g/24hr | --- | 10.0 | --- |
| | Beryllium[2], mg/dscm | --- | 0.092 | 0.0002 |
| | Arsenic[2], mg/dscm | --- | | 0.0072 |
| | Chromium[2], mg/dscm | --- | | 0.0023 |
| **Citations** | | 40 CFR Part 62, Subpart HHH | 40 CFR Part 61, Subpart C (Beryllium); 40 CFR Part 63, Subpart EEE; OAC rule 3745-31-05(A)(3) | 40 CFR Part 60, Subpart Eb; 25 Pa. Code §127.441 |

**All concentration based emission limits are corrected to 7 percent oxygen on a dry basis

[1]For hazardous waste incinerators, the emission limit is for the combined emissions of cadmium and lead [40 CFR 63.1219(a)(3).

[2]For hazardous waste incinerators, the emission limit is for the combined emissions of arsenic, beryllium, and chromium [40 CFR 63.12199(a)(4)].

[3]For hazardous waste incinerators, if complying with 100 ppmv CO, you must document that during the DRE test runs hydrocarbons do not exceed 10 ppmv during runs. Otherwise, the facility must comply with a 10 ppmv hydrocarbon limit.

[4]For hazardous waste incinerators, the emission limit is for hydrogen chloride and chlorine gas (total chlorine) expressed as a chloride (Cl(-)) equivalent.

[5] Limit is voluntary limit for emission netting purposes.

The focus of this review on larger existing systems provides a realistic comparison of national waste handling capabilities regarding the overall impact on environment and human health. As noted in Appendix C, there are sub-categories for some of the regulations for existing and newly constructed facilities, and for some combustor types different requirements are based on capacity (small, medium, and large). Most waste combustion systems currently operating and available for use are existing facilities due to the general difficulty in obtaining permits for new facilities. In general, the new facilities have somewhat lower regulatory emissions criterion (e.g., the Stericycle facility in Warren Ohio), and smaller systems have higher emission allowances. Large facilities are generally preferable for national scope programs due to capacity, and their higher feed rates generally allow for more consistent operations. Consistent operations typically result in better performance and this is reflected in the lower emission rates codified in regulation for that category.

## Data Observations

Although the different combustion systems manage different waste inputs, control and limitation requirements are required for similar classes of PBT air emission constituents. These include dioxin/furans, metals, acid gas, along with indicators of combustion efficiency such as carbon monoxide, particulates, and nitrogen oxides. The overall goal of these requirements is to establish and maintain conditions within the facility that result in destruction of the waste materials and minimize to the extent practical toxic emissions. However, the rate of allowed emission does vary to an extent between waste streams and facility type.

In general, the HMIWI reviewed has the most stringent emission limits based on applicable regulations noted in the facility permits, as can be seen in the table above. For the pollutants where the HMIWI regulations are not the most stringent they are extremely close to the next most stringent facility, which is the Municipal Waste Combustor. The least stringent regulatory emission limits reviewed were for the Hazardous Waste Incinerator. Based upon these regulatory comparisons, the combustor types that would typically be the most limiting of air emissions from combustion of waste would be the HMIWI and Large Municipal Waste Combustors.

However, beyond this focused comparison of regulatory detail, the capability of each category of waste combustor to effectively manage PBT constituents is a function of its technical configuration and operation. The larger combustion systems are able to incorporate and operate comprehensive emission control trains and their scale of operation tends to even out irregular waste streams providing consistent operational conditions. When evaluating HMIWI, municipal waste combustors, and hazardous waste incinerators, the individual operational scale, conditions, configurations, and compliance history are likely as informative of the ability of a facility to control PBT constituents as the regulatory class. A larger capacity well configured and operated facility in any of the three combustor classes evaluated should be effective for household medicine returns and medical waste destruction and provide for PBT management.

# Appendix D

## Sample Standard Mail-Back Package

**Description:**

Standard Mail-Back Package including plastic envelope with return label and instructional flyer, and unique identifier enabling tracking at collection and disposal.

**Package Size:**

Standard Mail-Back Package dimensions: 8.25” x 12”

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

## Sample Injector Mail-Back Package


**Description:**

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

**Package Size:**

1.4-quart mail-back system

Injector Mail-Back Services are an example of complete, turnkey systems to provide for the safe return of Pre-filled Injector Products via USPS.

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

# Sample Inhaler Mail-Back Package


**Description:**

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

**Package Size:**

Inhaler Mail-Back Package dimensions: 9” X 7”

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

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

# Appendix E

## Clean Harbors Aragonite, LLC Penalty Record

| YEAR(S) | AGENCY/AREA | NOVs ISSUED | FINES PAID |
|---|---|---|---|
| 2021 | USEPA | Related to 2018-2019 Inspections | Resolved by consent Order - $224, 903 fine and agreement to purchase and use FID monitors, perform quarterly monitoring, institute an improvement and replacement program, and increase internal and external audits ($420,000 total compliance action cost) |
| 2021 | Utah Department of Environmental Quality Division of Waste Management and Radiation Control | NOV Issued in for 12 identified violations in 2020 | $21,403 fine and agreed to a Supplemental Environmental Project |
| 2021 | Utah Department of Environmental Quality Division of Waste Management and Radiation Control | NOV issued for 2019 inspection. Violations included (but not limited to) failure to: follow procedures, provide required timely notifications, properly train personnel, maintain equipment, comply with waste manifest requirements, and properly store, label, track and manage certain waste. | Resolved by Consent Order -$80,630. |
| 2019 | US Drug Enforcement Administration (DEA) | Failure to file the ARCOS Year End Inventory. Delinquent filing of quarterly ARCOS reports for the 1st, 2nd, 3rd, and 4th quarters in 2017 and for the 2nd quarter in 2018. Failure to maintain | Resolved by Consent Order - $96,000. |

| | | | |
|---|---|---|---|
| | | separately a biennial inventory of controlled substances. Failure to record beginning of business/close of business on the biennial inventory. | |
| 2019 | Utah Department of Environmental Quality Division of Waste Management and Radiation Control | Consent Order covered violations assessed during FY2014, FY2015, FY2016, FY2017, and FY2018 inspections including (but not limited to) failure to: follow procedures, document and report manifest discrepancies, properly maintain equipment and facility, track waste, properly categorize waste, manage infectious waste, submit timely reports, properly store waste, and maintain certain permits. | March 8, 2019 Stipulation and Consent Order - $330,000. Fine paid in May 2021. |
| 2018 | Utah Department of Environmental Quality Division of Air Quality | Twelve violations related to timely reporting and administrative steps under Title V, NESHAP or RCRA between 2016 and 2017 | Civil penalty- $23,750 |

# Curtis Bay Energy, LP Penalty Record

| YEAR | NOVs | FINES |
|---|---|---|
| 2022 | None | N/A |
| 2021 | None | N/A |
| 2020 | None | N/A |
| 2019 | None | N/A |
| 2018 | MDE issued a notice of violation to the facility as a result of exceeding the mercury emission limit during a stack test conducted on Incinerator EU-1 on March 21 and 22, 2018 and during a retest on May 7 and 8, 2018. | None |

# Heritage Thermal Service-Ohio Penalty Record

## Facility Summary


HERITAGE THERMAL SERVICES
1250 ST. GEORGE STREET, EAST LIVERPOOL, OH 43920 ⓘ
**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
- CWA Effluent Charts
- EPA Facility Documents
- 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 | 2 ⓘ | 08/16/2021 | Violation w/in 1 Year | 7 | 0 | 17 | 1 | $288,000 | -- | -- |
| CWA | -- | 03/17/2015 | No Violation Identified | 0 | 0 | -- | -- | -- | -- | -- |
| RCRA | 8 | 02/08/2023 | No Violation Identified | 0 | 0 | 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), Active VSQG, (OHR000220285)
**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 | 04/01/2023 | 7 | 03/31/2023 |
| CWA | OH0107298 | No | 12/31/2022 | 0 | 03/31/2023 |
| RCRA | OHD980613541 | No | 04/01/2023 | 0 | 03/31/2023 |
| RCRA | OHR000220285 | No | 04/01/2023 | 0 | 03/31/2023 |

## Three-Year Compliance History by Quarter

Download Data

| Statute | Program/Pollutant/Violation Type | | | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 | QTR 12 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| CAA (Source ID: OH0000000215020233) | | | | | 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 | 07/01-09/30/22 | 10/01-12/31/22 | 01/01-03/31/2 |
| | Facility-Level Status | | | | Violation Identified | Violation Identified | No Violation Identified | No Violation Identified | Violation Identified | Violation Identified | No Violation Identified | Violation Identified | Violation Identified | Violation Identified | No Violation Identified | No Violation Identifie |
| | HPV History | | | | | | | | | | | | | | | |
| | Violation Type | Agency | Programs | Pollutants | | | | | | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | 09/03/2021 | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | 05/21/2021 | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | | | 03/01/2022 | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | | | | | 09/23/2022 | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | 05/21/2021 | | | | | | | |

## Compliance Summary Data

| Statute | Source ID | Current SNC/HPV | Current As Of | Qtrs with NC (of 12) | Data Last Refreshed |
|---|---|---|---|---|---|
| CAA | OH0000000215020233 | No | 04/01/2023 | 7 | 03/31/2023 |
| CWA | OH0107298 | No | 12/31/2022 | 0 | 03/31/2023 |
| RCRA | OHD980613541 | No | 04/01/2023 | 0 | 03/31/2023 |
| RCRA | OHR000220285 | No | 04/01/2023 | 0 | 03/31/2023 |

## Three-Year Compliance History by Quarter

Download Data

| Statute | Program/Pollutant/Violation Type | | | | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 | QTR 12+ |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| CAA (Source ID: OH0000000215020233) | | | | | 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 | 07/01-09/30/22 | 10/01-12/31/22 | 01/01-03/31/2 |
| | Facility-Level Status | | | | Violation Identified | Violation Identified | No Violation Identified | No Violation Identified | Violation Identified | Violation Identified | No Violation Identified | Violation Identified | Violation Identified | Violation Identified | No Violation Identified | No Violation Identifie |
| | HPV History | | | | | | | | | | | | | | | |
| | Violation Type | Agency | Programs | Pollutants | | | | | | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | 09/03/2021 | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | 05/21/2021 | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | | | 03/01/2022 | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | | | | | 09/23/2022 | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | 05/21/2021 | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | | | 03/01/2022 | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | 09/11/2020 | | | | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | 05/21/2021 | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | 05/15/2020 | | | | | | | | | | | |
| CAA | FRV | OH | CAAMACT, CAANESH, CAANSPS, CAASIP, CAATVP | FACIL | | | | | | | | | 06/03/2022 | | | |

| Statute | Program/Pollutant/Violation Type | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 | QTR 12 | QTR 13+ |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| CWA (Source ID: OH0107298) | | 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 | 07/01-09/30/22 | 10/01-12/31/22 | 01/01-03/31/23 |
| | 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 | No Violation Identified | Undetermined |
| | Quarterly Noncompliance Report History | | | | | | | | | | | | | |

| Statute | Program/Pollutant/Violation Type | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 | QTR 12+ |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| RCRA (Source ID: OHD980613541) | | 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 | 07/01-09/30/22 | 10/01-12/31/22 | 01/01-03/31/23 |
| | 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 | No Violation Identified |
| | Violation Agency | | | | | | | | | | | | |
| RCRA (Source ID: OHR000220285) | | 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 | 07/01-09/30/22 | 10/01-12/31/22 | 01/01-03/31/23 |
| | 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 | No Violation Identified |
| | Violation Agency | | | | | | | | | | | | |

## Informal Enforcement Actions

Last 5 Years

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

*Entries in italics are not counted as "informal enforcement actions" in EPA policies pertaining to enforcement response tools.*

## Formal Enforcement Actions

Last 5 Years

| atute | 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 | State/Local Penalty Assessed | Penalty Amount Collected | SEP Value | Comp Action Cost |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| CAA | ICIS-Air | 112 | AIR/OH0000000215020233 | Judicial | 05-2015-5085 | EPA | HERITAGE-WTI | 10/18/2018 | 1 | 04/01/2022 | $288,000 | $0 | $288,000 | $302,500 | $305,000 |

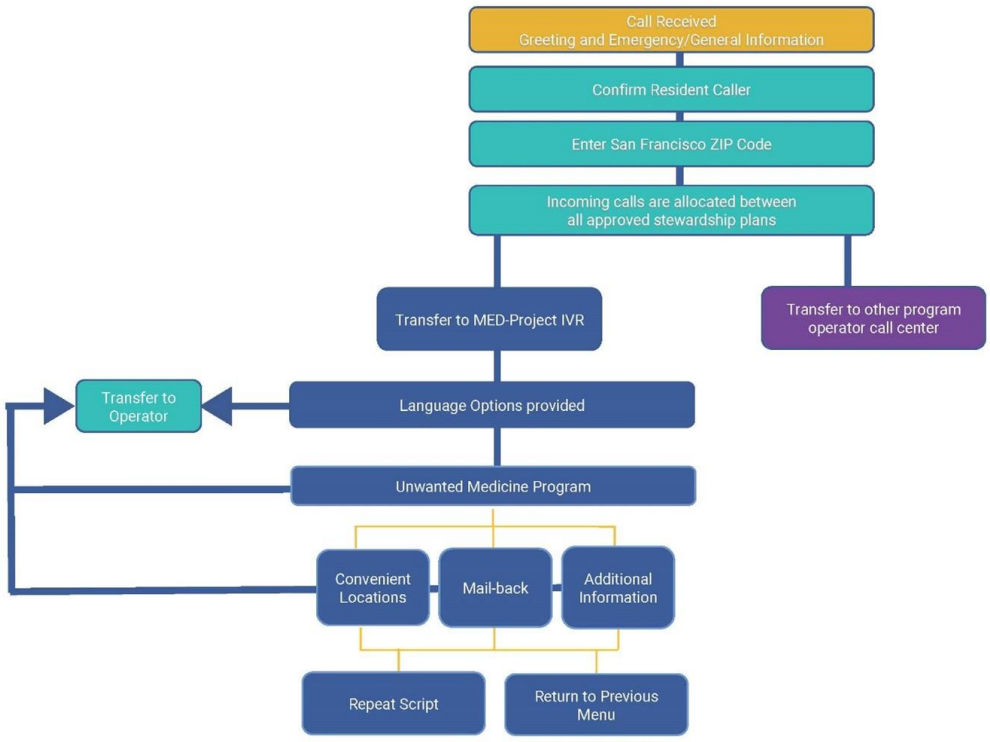
## Ross Incineration Services, Inc. Penalty Record

| YEAR | AGENCY | NOVs ISSUED | FINES PAID |
|---|---|---|---|
| 2022 | U.S. EPA | Finding of Violation proposed in 2020 regarding breakthrough on tank interfaces under the Benzene national Emission Standards for Hazardous Air Pollutants regulations. | Consent Agreement and Final Order requiring third party evaluation of Leak Detection and Repair programs and payment of $95,000 fine. |
| 2021 | U.S. EPA | Notice of Potential Violation and Opportunity to Confer issued in 2020 regarding use of a barge to store waste without a permit. | Consent Agreement and Final Order provided permission to continue to use barge to repackage waste and payment of $20,015 fine. |
| 2020 | OEPA | NOV issued in response to voluntary disclosure of discharge of combustion gasses containing carbon monoxide in excess of RIS hourly rolling average. | None. Considered resolved by OEPA. |
| 2019 | OEPA | NOV issued in response to 10/23/2019 voluntary disclosure of noncompliance with waste storage time limits. | RIS received letter indicating return to compliance 12/17/2019. |
| 2019 | OEPA | Two container management violations issued during 9/9/2019 - 9/11/2019 inspection | None, Violations were abated at time of inspection. |
| 2019 | OEPA | Three container management violations issued during 6/18/2019 inspection | None, violations abated at time of inspection. |
| 2018 | OEPA | NOV issued in response to 8/27/2018 voluntary disclosure of noncompliance with waste storage time limits | Civil Penalty of $20,000. |
| 2018 | OEPA | Two facility generated waste containers were open during 6/25/2018 inspection. | Both containers closed during inspection and violation was resolved. |
| 2018 | OEPA | NOV issued 5/30/2018 in response to violations reported in 2018 quarterly deviation report. | None. Considered resolved by OEPA. |
| 2018 | OEPA | One container management violation issued during 3/12/2018 – 3/14/2018 inspection | None, violations abated at time of inspection. |

# Appendix F

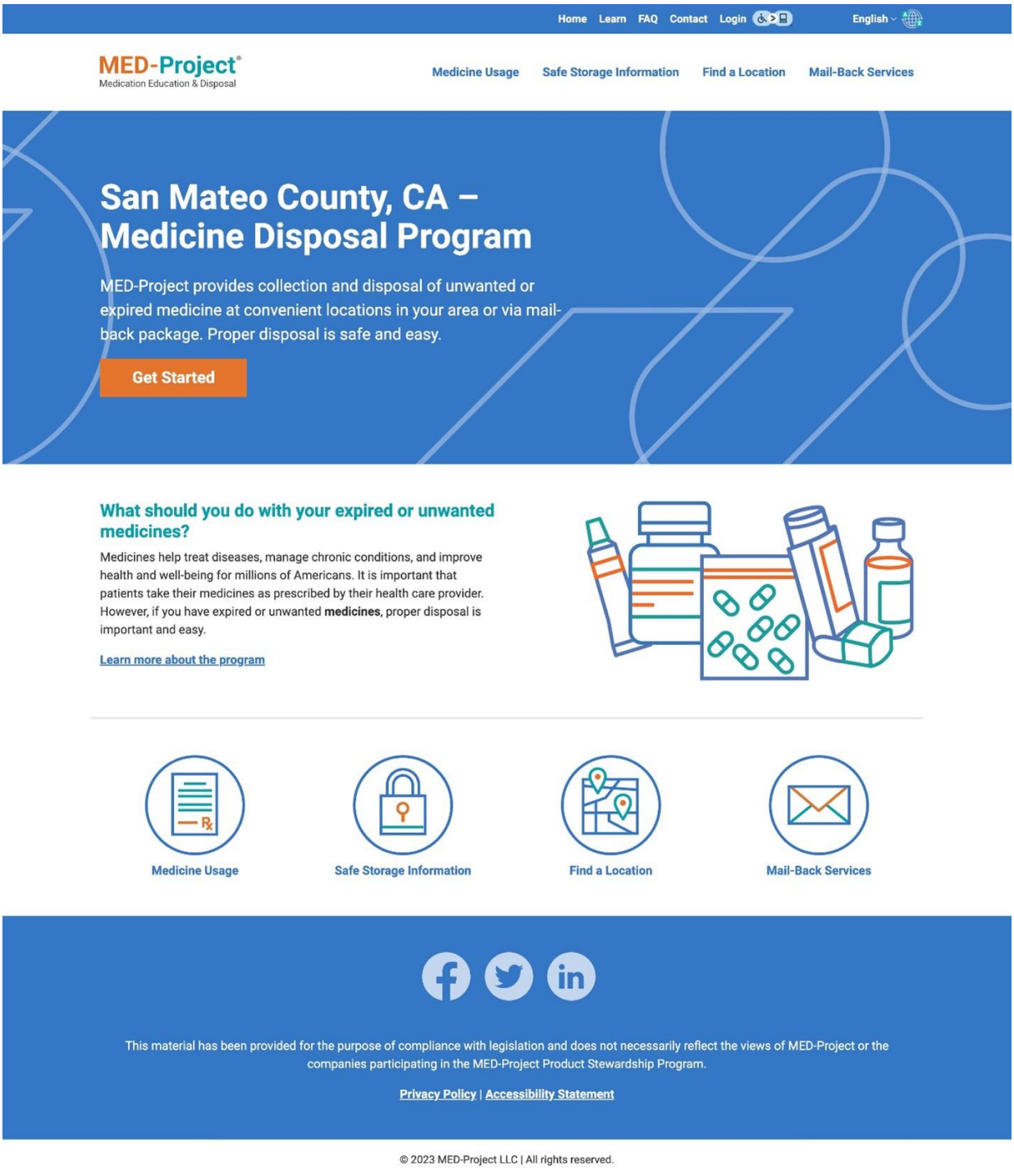
## Sample Call Center Flow

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



# Appendix G

## Sample MED-Project Website Pages



Home Learn FAQ Contact Login English

MED-Project®
Medication Education & Disposal

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

# Medicine Usage

Follow safe disposal instructions if found on label, package, or package insert.

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

Never dispose of medication down the sink or toilet unless directed.

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

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

# Safe Storage Information

It is important to take medication as prescribed by your health care provider and as indicated on the label or packaging . Always be sure to store medicine securely to prevent accidental ingestion or misuse by others, especially children. If you have expired or unwanted household medication, proper storage and disposal are easy. To protect your family, pets, and community, follow these instructions for secure storage and safe disposal:

## Use as Directed

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

## Store Securely

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

## Dispose Safely

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

Please separate and remove any items and medication that are not accepted before disposing. Do not place medicine in the trash or recycling and never flush them down the sink or toilet.

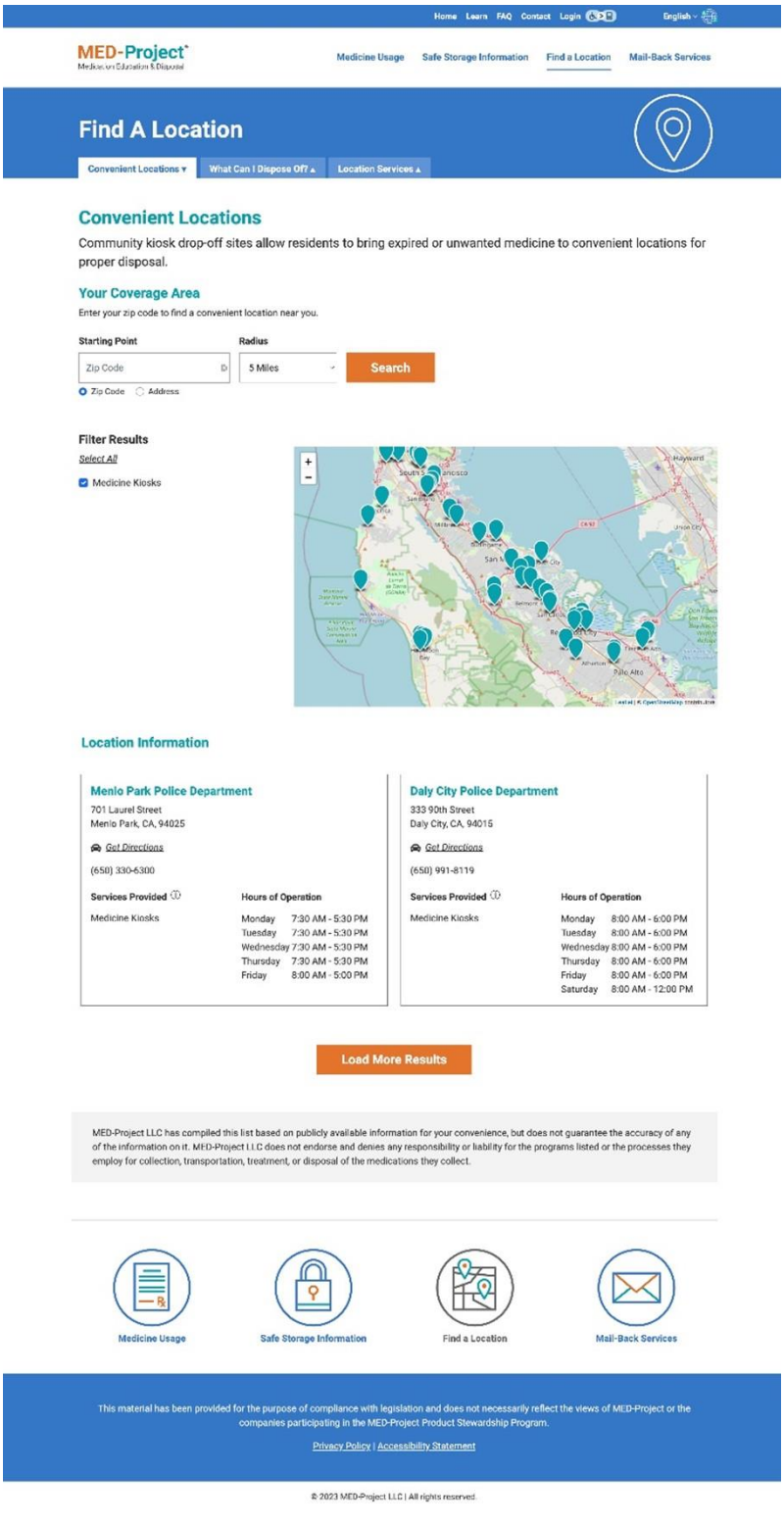
To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.


Medicine Usage


Safe Storage Information


Find a Location


Mail-Back Services


Home Learn FAQ Contact Login English
MED-Project
Medication Education & Disposal
Medicine Usage
Safe Storage Information
Find a Location
Mail-Back Services
Find A Location
Convenient Locations
What Can I Dispose Of?
Location Services
Convenient Locations
Community kiosk drop-off sites allow residents to bring expired or unwanted medicine to convenient locations for proper disposal.
Your Coverage Area
Enter your zip code to find a convenient location near you.
Starting Point
Zip Code
Radius
5 Miles
Search
Zip Code
Address
Filter Results
Select All
Medicine Kiosks
Location Information
Menlo Park Police Department
701 Laurel Street
Menlo Park, CA, 94025
Get Directions
(650) 330-6300
Services Provided
Medicine Kiosks
Hours of Operation
Monday 7:30 AM - 5:30 PM
Tuesday 7:30 AM - 5:30 PM
Wednesday 7:30 AM - 5:30 PM
Thursday 7:30 AM - 5:30 PM
Friday 8:00 AM - 5:00 PM
Daly City Police Department
333 90th Street
Daly City, CA, 94015
Get Directions
(650) 991-8119
Services Provided
Medicine Kiosks
Hours of Operation
Monday 8:00 AM - 6:00 PM
Tuesday 8:00 AM - 6:00 PM
Wednesday 8:00 AM - 6:00 PM
Thursday 8:00 AM - 6:00 PM
Friday 8:00 AM - 6:00 PM
Saturday 8:00 AM - 12:00 PM
Load More Results
MED-Project LLC has compiled this list based on publicly available information for your convenience, but does not guarantee the accuracy of any of the information on it. MED-Project LLC does not endorse and denies any responsibility or liability for the programs listed or the processes they employ for collection, transportation, treatment, or disposal of the medications they collect.
Medicine Usage
Safe Storage Information
Find a Location
Mail-Back Services
This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the companies participating in the MED-Project Product Stewardship Program.
Privacy Policy | Accessibility Statement
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MED-Project®
Medication Education & Disposal

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

# Find A Location

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

## Location Services

See descriptions of our services below.

### Medicine Kiosks

Medicine Kiosks are installed at nearby locations such as pharmacies and law enforcement offices for residents to simply drop-off their expired or unwanted medicine for safe and free disposal.

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

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

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

Privacy Policy | Accessibility Statement

# Find A Location



## What Can I Dispose Of?

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

### Medicine

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

### Accepted

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

### Not Accepted

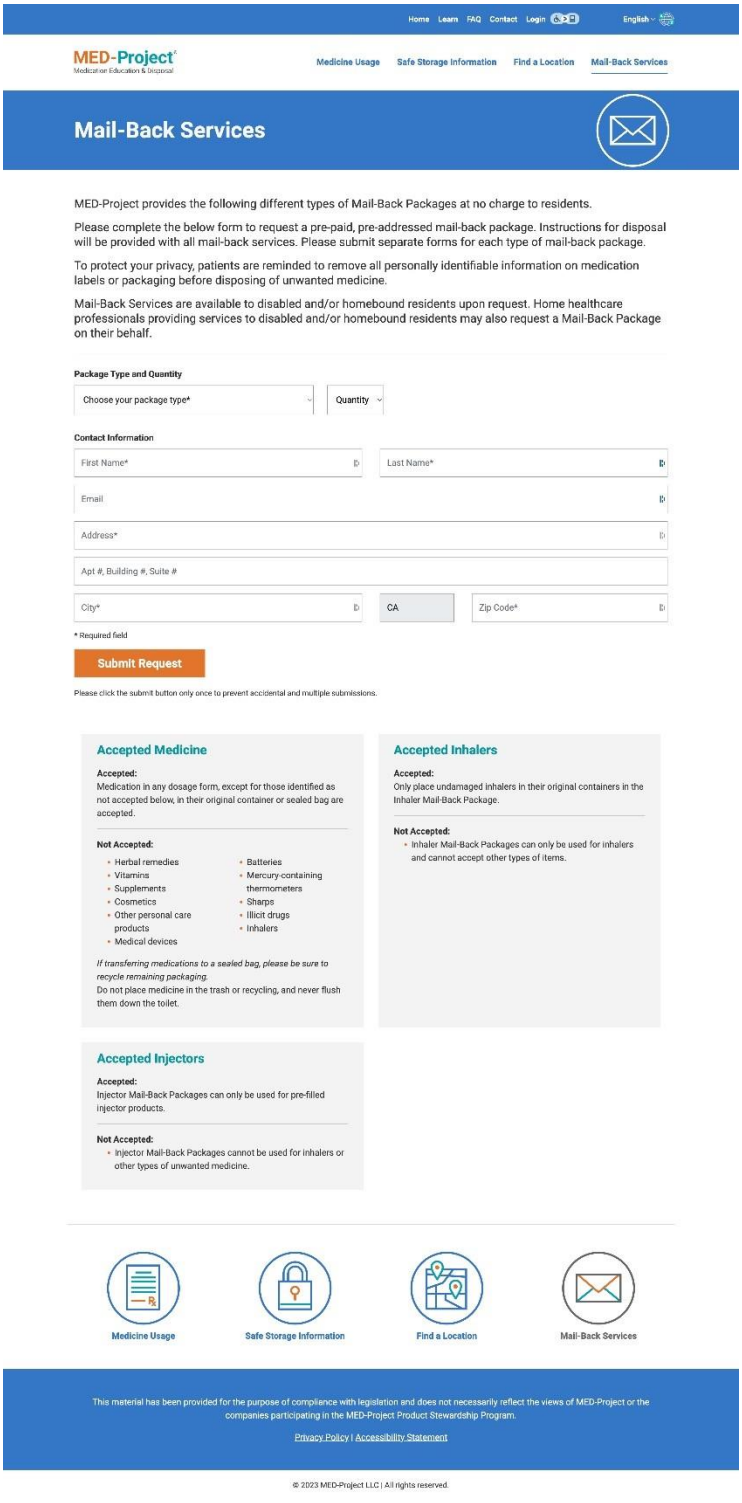
- Herbal remedies
- Vitamins
- Supplements
- Cosmetics
- Other personal care products
- Medical devices
- Batteries
- Mercury-containing thermometers
- Sharps
- Illicit drugs

*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.

For more information about the County of San Mateo Safe Medicine Disposal Ordinance, please see: www.smchealth.org/rxdisposal

For more information about the sharps disposal information in the County of San Mateo, please see: www.smchealth.org/sharps


Home Learn FAQ Contact Login English
MED-Project
Medication Education & Disposal
Medicine Usage
Safe Storage Information
Find a Location
Mail-Back Services
Mail-Back Services
MED-Project provides the following different types of Mail-Back Packages at no charge to residents.
Please complete the below form to request a pre-paid, pre-addressed mail-back package. Instructions for disposal will be provided with all mail-back services. Please submit separate forms for each type of mail-back package.
To protect your privacy, patients are reminded to remove all personally identifiable information on medication labels or packaging before disposing of unwanted medicine.
Mail-Back Services are available to disabled and/or homebound residents upon request. Home healthcare professionals providing services to disabled and/or homebound residents may also request a Mail-Back Package on their behalf.
Package Type and Quantity
Choose your package type*
Quantity
Contact Information
First Name*
Last Name*
Email
Address*
Apt #, Building #, Suite #
City*
CA
Zip Code*
* Required field
Submit Request
Please click the submit button only once to prevent accidental and multiple submissions.
Accepted Medicine
Accepted:
Medication in any dosage form, except for those identified as not accepted below, in their original container or sealed bag are accepted.
Not Accepted:
Herbal remedies
Vitamins
Supplements
Cosmetics
Other personal care products
Medical devices
Batteries
Mercury-containing thermometers
Sharps
Illicit drugs
Inhalers
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.
Accepted Inhalers
Accepted:
Only place undamaged inhalers in their original containers in the Inhaler Mail-Back Package.
Not Accepted:
Inhaler Mail-Back Packages can only be used for inhalers and cannot accept other types of items.
Accepted Injectors
Accepted:
Injector Mail-Back Packages can only be used for pre-filled injector products.
Not Accepted:
Injector Mail-Back Packages cannot be used for inhalers or other types of unwanted medicine.
Medicine Usage
Safe Storage Information
Find a Location
Mail-Back Services
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# Learn

## Outreach and Education

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

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

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

For additional information on the program, MED-Project has developed an educational toolkit which includes the materials below.

### Brochure - Medicine Program

View Brochure

### Frequently Asked Questions

View our FAQs

### Video Public Service Announcement (PSA) – Medicine Program

Watch PSA

### Survey Information & Results

View Survey

If you would like any of these materials emailed to you, contact: sanmateocounty@med-project.org

# Brochure

## Outreach and Education

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

## Safely Dispose of Expired or Unwanted Medicine

### What Should You Do With Your Expired or Unwanted Medicine?

There are a number of ways to dispose of 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.

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.

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

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

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

**Not Accepted:** Herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

### Disposal of Household Medicine

**Check the Package**

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

**Convenient Locations**

To find kiosk sites in your area, visit the Convenient Locations section of www.med-project.org. Mail-Back Distribution Locations may also be available in your area.

**Mail-Back**

Mail-Back Services for unwanted medicine, pre-filled injector products, and inhalers are available. Visit the Mail-Back section of www.med-project.org.

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

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).

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Medication Education & Disposal

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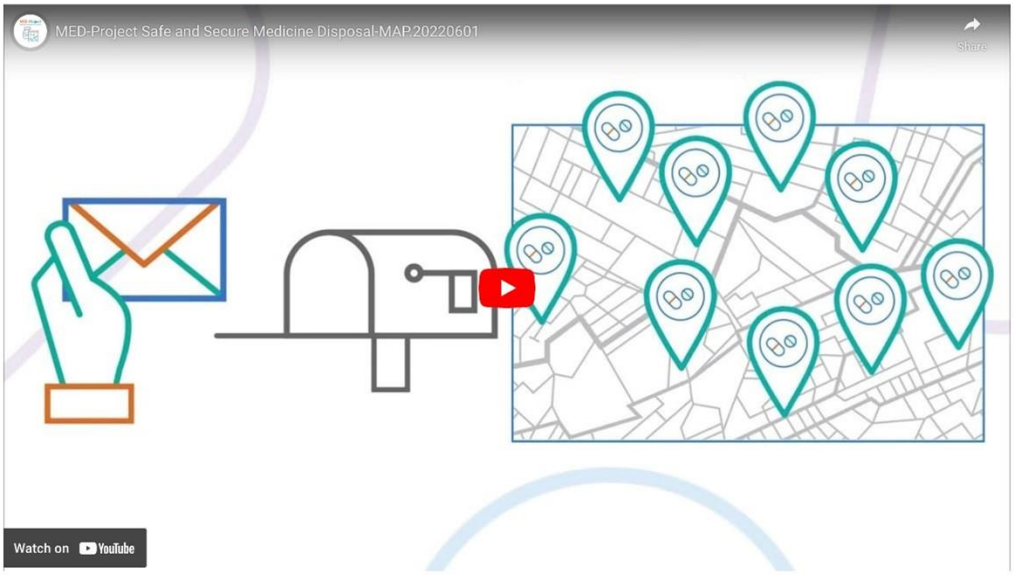
# Learn

## Outreach and Education

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

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# Contact

## Residents

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

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

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

## Convenient Locations

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

**Click here:**
Login or Register for an Account

**Call us by Phone:**
1 (833) MED-PROJECT or 1 (833) 633-7765

**Fax us:**
1 (866) 633-1812

**Email us:**
Email Inquiries for Medicine Disposal:
sanmateocounty@med-project.org

**Address:**
Dr. Victoria Travis, PharmD, MS, MBA
National Program Director
MED-Project LLC

## Convenient Locations/Host Sites - Request Materials

Login to your account to order brochures.

## 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

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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MED-Project
Medication Education & Disposal

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# 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 my pet has ingested medication?
- Whom should I call with a question about my medication?
- Where can I find information about the safe storage of medication?
- How do I dispose of my expired or unwanted medicine?
- Should I remove my personal information before disposing of my medication?
- Where are the MED-Project disposal locations nearest me?
- Will it cost me anything to dispose of my expired or unwanted medications?
- Can I flush my medication down the toilet?
- I am unable to go to a kiosk or attend a take-back event. How can I dispose of my expired or unwanted medicine?
- I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?
- Where else can I find information about the safe disposal of expired or unwanted medicines?
- What is recommended for safe disposal of expired or unwanted medicine in San Mateo County?
- Where can I find information about California's Prop 65?

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# Appendix H

## Single System of Promotion

**PLAN OPERATORS' (MED-PROJECT LLC AND INMAR INTELLIGENCE)**

**AGREED-UPON PRINCIPLES FOR THE SINGLE SYSTEM OF PROMOTION**

**IN SAN MATEO COUNTY**

This statement of principles sets forth the elements of a "Single System of Promotion," as required by the Environmental Health Division of San Mateo County (the "Department"); the San Mateo County Safe Medicine Disposal Ordinance as codified in the San Mateo County Ordinance Code, Chapter 4.116, Sections 4.116.010 through 4.116.190 ("Ordinance"). This Single System of Promotion has been agreed upon by MED-Project LLC ("MED-Project ") and Inmar Intelligence, Inc. ("Inmar"), the two Stewardship Plan operators of approved Stewardship Plans ("Plan Operators") in San Mateo County. The terms "County Residents," "Director," "Mail-back Services," "Stewardship Plan," and "Unwanted Covered Drugs," as used herein, have the same meaning as in the Ordinance.

**A. Antitrust Compliance**

1. The following antitrust compliance statement shall be read at the beginning of all meetings between the Plan Operators and shall be included in all writings memorializing the agendas, actions, proceedings, and outcomes of such meetings:

"MED-Project and Inmar Intelligence ("Inmar") have policies of strict compliance with federal and state antitrust laws. The antitrust laws prohibit competitors – including MED-Project and Inmar – from making agreements or engaging in actions that could result in unreasonable restraint of trade. Consequently, when engaging in any discussions between them, MED-Project and Inmar must avoid discussing any of the following topics: prices, fees, rates, profit margins, or other terms or conditions of sale; allocation of markets or customers or division of territories; or refusals to deal with or boycotts of suppliers, customers, or other third parties, or topics that may lead MED-Project and Inmar to not deal with a particular supplier, customer, or third party. If any participant senses that the meeting is drifting into any of these areas, they should notify the other participants and terminate the meeting."

**B. Kiosks (San Mateo County Ordinance Code 4.116.060(a)(2))**

1. Plan Operators agree that their kiosks for the collection of Unwanted Covered Drugs need not be the same in design or color.

2. Each Plan Operator shall independently maintain one kiosk in the County-owned pharmacy(ies).

**C. Website (San Mateo County Ordinance Code 4.116.060(a)(3))**

1. Plan Operators will select a third-party vendor to develop and host a neutral (unbranded) landing page for their approved Stewardship Plans in San Mateo County. Each Plan Operator will contract separately with the selected vendor.
2. The selected vendor shall be responsible for creating and implementing a neutral landing page which will provide County Residents with:
   i. A map of all kiosk locations and mail-back materials distribution sites utilized by the Plan Operators in San Mateo County, which shall be updated at least quarterly unless more frequent updating is required by law.
   ii. A directory or listing of the Plan Operators' URLs.

3. The Plan Operators' URLs in the directory will send County Residents to each Plan Operator's website where information about their Stewardship Plans' activities, such as the schedule and location of take-back events; services, such as ordering mail-back envelopes; and educational and outreach materials, will be available.
4. Plan Operators will utilize the Uniform Resource Locator (URL) medtakebacksanmateo.org as the neutral (unbranded) landing page for their approved Stewardship Plans in San Mateo County.
5. Plan Operators will direct County Residents who initially visit their organizational websites to the neutrally branded URL medtakebacksanmateo.org.
6. The neutral (unbranded) landing page shall not be used for commercial purposes, such as the sale of products or services.

**D. Toll-free Telephone Number (San Mateo County Ordinance Code 4.116.060(a)(3))**

1. Plan Operators will direct resident callers to the neutral toll-free telephone number, 844-482-5322 or 844-4-TAKE-BACK.
2. Plan Operators will select a single third-party call center vendor for services for their approved Stewardship Plans in San Mateo County. Each Plan Operator will contract separately with the selected vendor.
3. The neutral toll-free telephone number will allow County Residents to select a Plan Operator through an interactive voice response system, or other method, as agreed upon by the Plan Operators.
4. The neutral toll-free telephone number shall not be used for commercial purposes, such as the sale of products or services.
5. Plan Operators will direct callers who initially call their own telephone numbers to the neutral toll-free telephone number.

**E. Promotion/Media (San Mateo County Ordinance Code 4.116.060(a)(3))**

1. Each Plan Operator shall separately satisfy San Mateo County's promotional, language, and media requirements, and each Plan Operator, independent of the other, will provide the Mail-back Services, educational and outreach materials, and other services included in each Operator's approved Stewardship Plan.

**F. Surveys (San Mateo County Ordinance Code 4.116.060(a)(4))**

1. Plan Operators will coordinate conducting the surveys required in the Ordinance on a biennial basis, with sampling starting in Q1 2024.
2. Plan Operators shall select a third-party survey vendor to design and implement the required surveys and shall contract separately with the selected vendor.