

August 10, 2023

SENT VIA ELECTRONIC MAIL

Heather Forshey
Director, Environmental Health Services
San Mateo County Health
2000 Alameda de las Pulgas
Suite 100
San Mateo, CA 94403
hforshey@smcgov.gov
pollutionprevention@smcgov.gov

Re: Notice of Determination

Dear Ms. Forshey:

MED-Project LLC (“MED-Project”) appreciates the receipt of the San Mateo County Environmental Health Services (“Department” or “County”) Notice of Determination regarding, and approval of, MED-Project’s Stewardship Plan for Unwanted Medicine from Households (“Stewardship Plan” or “Plan”) submitted on April 14, 2023, and the opportunity to meet with Chief Rogers and Deputy Director Ice on August 9, 2023. During the meeting we discussed the unique aspects of San Mateo County and MED-Project’s implementation of the Plan since 2016. Since then, MED-Project has served the residents of San Mateo County by collecting over 220,000 pounds of unwanted medicine through over 50 collection receptacles located across the county and unwanted medicine mail-back packages requested by residents via the website and call center. The MED-Project website and call center serve residents 24 hours per day, every day of the year. MED-Project’s outreach and education efforts have thus far resulted in over 43 million impressions to County of San Mateo residents, stemming from its comprehensive education and outreach program.

In this letter, MED-Project responds to the Department’s statement that the conditional approval is contingent upon MED-Project providing a letter that commits to revise and resubmit the Stewardship Plan to meet conditions in the Notice of Determination, and to include guidance provided by the Director in the Guidance for the Implementation of a Single System of Promotion and Program (as published on May 31, 2023) (the “Guidance” or “Guidance Document”). MED-Project is providing this response to meet the Department’s Ordinance and, where appropriate and in good faith, address the Guidance published on May 31, 2023.

Below, we identify the conditions identified in the Notice of Determination and provide MED-Project’s response.

Condition #1: At a minimum, the Stewardship Plans must implement joint collective events at least annually in areas with no access to drop-off boxes within five miles in accordance with Section III.2.C of the Guidance Document.

MED-Project Response to Condition #1:

As an initial matter, MED-Project assumes that the reference in Condition #1 to Section III.2.c. of the Guidance Document is meant to be a reference to Section III.1.c. If we are incorrect in this assumption, please advise.

MED-Project meets Ordinance Section 4.116.050(b) and the Guidance by providing reasonably convenient and equitable access to robust take-back services for residents. MED-Project meets access 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 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 our placement of kiosk drop-off sites across the County. MED-Project operates kiosks within five miles of all cities within San Mateo County as shown in the GIS map provided as Attachment A. Due to “populated areas” being undefined in the Ordinance, Regulation, and Guidance, MED-Project has utilized incorporated cities as populated areas 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. Please note that in Portola Valley, there are no suitable locations, such as pharmacies or law enforcement offices, for a kiosk drop-off site under applicable federal, state and county laws and regulations. For example, the town of Portola Valley has no police department, and contracts with the San Mateo County Sheriff’s Office for law enforcement services, with those services being based at a location over nine miles away, in Redwood City, CA. MED-Project is in the process of establishing a mail-back distribution location within five miles of Portola Valley.

Regarding the Healthy Places Index described in the Guidance, MED-Project has established kiosk drop-off sites within 2.5 miles of all residents identified in underserved areas, per GIS analysis, and attached herein as Attachment B.

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.

While MED-Project currently meets the Service Convenience Goal, pursuant to Condition #1, and in the event that MED-Project no longer meets the Service Convenience Goal, MED-Project will work with the other existing and approved program operator(s) to request and organize joint collection events at least annually in areas with no access to drop-off boxes or mail-back distribution sites within five miles of an incorporated city in accordance with Section III.1.c. of the Guidance Document. Regarding collection events, MED-Project also notes that, in contrast to the availability of its mail-back services, collection events may encourage residents to stockpile

unwanted medicine for up to a year until they can be disposed of at the time a collection event is scheduled. Collection events also rely on law enforcement agency oversight and could distract already strained law enforcement resources from other priorities for the community, including and especially in remote or rural areas, where law enforcement services may already be limited, assuming law enforcement agencies are able and willing to oversee such collection events.

Condition #2: The Stewardship Plan must clearly state that entities participating in the Stewardship Plan will operate and comply with all applicable federal and state laws, rules, and regulations, and describe the procedures to accomplish this. These procedures must include routine verification, regardless of the type of Collection Service, as described in Section III.2.c. of the Guidance Document, and the Department shall have access to these records.

MED-Project Response to Condition #2:

Entities participating in the Stewardship Plan operate and comply with applicable federal and state laws, rules, and regulations. The following section describes the policies and procedures maintained for the Program relating to training and meeting applicable laws. The relevant policies and procedures are codified in or required under MED-Project's agreements with its Vendors involved in the collection and disposal of Covered Drugs under the Program, Authorized Collectors, law enforcement agencies, and law enforcement agencies supporting Collection Events.

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

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

- Review of Vendor documentation.
- Periodic Vendor audits.
- Review of processes and procedures for compliance with relevant regulatory agencies.
- 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 Covered Drugs 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 authorized collectors require that the authorized collector:

- 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 collection events require that law enforcement:

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

Condition #3: MED-Project must implement the procedures from Section III.2. of the Guidance Document.

MED-Project Response to Condition #3:

MED-Project's current operations meet all the requirements of Condition #3.

MED-Project utilizes an expedited service process that is designed to provide services within 48-hours, meeting Sections III.2.a. and b of the Guidance. MED-Project's Scheduled Collection Service and rapid response programs, outlined in Plan Sections V.B.5 and V.B.7, are designed to provide services within 48 hours upon request from sites.

With regards to Section III.2.b., this requirement is met via the On-Demand Collection Service outlined in Plan Section V.B.5, which offers the convenience of kiosk drop-off site employees being able to schedule pick-ups as needed, minimizing any inconvenience of scheduled services that might otherwise impact operation of kiosk drop-off sites. On-Demand Collection Services provide a more expedited timeline for

servicing of kiosks than standard scheduled services by a technician, satisfying Section III.2.b. As outlined in the Plan, and in MED-Project's response to Condition #2, above, MED-Project requires that all participating entities comply with all applicable laws and regulations and ensure that all necessary employees receive required training for the operation of the program, including On-Demand Collection Service training requirements. MED-Project provides participating entities with all the necessary training materials to assist host sites with training completion.

Condition #4: MED-Project must continue to use a permitted hazardous waste disposal facility to dispose of the unwanted medicine. Additional information shall be submitted for further consideration for approval of municipal waste combustors.

MED-Project Response to Condition #4:

Section 4.116.070 (a) of the Ordinance permits the use of hazardous waste incinerators for the disposal of unwanted medicine collected under the Ordinance. Additionally, Section 4.116.120 (a) of the Ordinance allows for the County to approve other forms of disposal. MED-Project previously included a request for the approval of medical waste incinerators in its list of disposal sites in the April 15, 2019 Plan that was approved by the County on January 16, 2020.

The most recent confirmation of this approval can be found in a letter from Dr. Victoria Travis to Helen Godinez, dated April 1, 2021, attaching a list of all proposed disposal facilities, including both hazardous waste incinerators and medical waste incinerators, which was approved by the County in a letter from Heather Forshey to Dr. Victoria Travis, dated December 9, 2021, both of which are attached hereto as Attachment C. MED-Project intends to continue using both hazardous waste and medical waste incinerators for the Program, as it has reported in annual reports covering over three years of operating history.

Condition #5: MED-Project must update the kiosk signs to include pictures of only these items to be dropped into kiosks.

MED-Project Response to Condition #5:

MED-Project confirms that kiosks can accept inhalers, and that the kiosk signs properly contain pictures of inhalers.

Condition #6: MED-Project must provide educational and promotional material to pharmacies, health care facilities, veterinary facilities, and other interested parties for dissemination to County residents in accordance with the requirements of the Ordinance and the guidance provided by the Director in Section IV.2. of the Guidance Document.

MED-Project Response to Condition #6:

MED-Project meets Condition #6 by providing information on how to request educational and promotional materials to pharmacies, health care facilities, veterinary facilities, and other interested parties for dissemination to County residents in accordance with the requirements of the Ordinance and Section IV.2. of the Guidance Document, subject to the limitations expressed below in the MED-Project Response to Condition #7. This method allows facilities and other interested parties to request and provide input on the quantity of desired materials which, in MED-Project's experience, prevents wastage associated with sending unsolicited or undesired materials. Allowing MED-Project to meet this requirement by providing an annual notice of availability of materials, and information on how to request these materials in necessary quantities, will reduce overall paper and postage wastage in the County and will reduce issues and frustration for participating entities.

Condition #7: MED-Project must implement a single system of promotion in accordance with the requirements of the Ordinance and Section IV. of the Guidance Document.

MED-Project Response to Condition #7:

MED-Project will implement a single system of promotion in accordance with the requirements of the Ordinance, Regulations, and Section IV of the Guidance Document, as detailed below. MED-Project will implement a single system of promotion that uses a variety of outreach tactics, and that involves coordination with other approved program operators 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 MED-Project has issued to the other approved program operator. Such Terms of Coordination are attached hereto as Attachment D.

MED-Project meets the requirements of Guidance Section IV.2.a. and IV.2.b. by annually contacting pharmacies, health care facilities, and veterinary facilities in San Mateo County to offer printed outreach materials.

With regards to Section IV.2.d., MED-Project utilizes the California Department of Consumer Affairs website at https://www.dca.ca.gov/consumers/public_info/index.shtml to identify new pharmacists, retailers of Covered Drugs, and health care practitioners, to contact annually to offer printed outreach materials.

While MED-Project can encourage participating locations to display outreach materials in high traffic areas, MED-Project does not have the authority to dictate the design or set-up of police departments, pharmacies, or any other host site locations to require that materials be put in lobbies, storefronts, or waiting areas. MED-Project will continue to provide materials to facilities as outlined above, and will encourage that these materials be prominently displayed, however, MED-Project cannot commit to achieving Section IV.2.c. of the Guidance for the reasons explained above.

Final Unnumbered Condition: Section VI of the Plan, “Plan and Collection Goods” and Section IX “Training” must align with Section III of the Guidance Document.

MED-Project Response to Final Unnumbered Condition:

MED-Project has addressed alignment with Sections III.1. and III.2. in its responses above. Section III.3.a. is met via coordination with other approved program operator(s) whereby MED-Project and the other existing approved program operator have agreed to individually distribute promotional materials. A comparison of MED-Project materials, and those utilized by the other approved program operator, easily demonstrates that the outreach materials utilized by both MED-Project and the other approved program operator are substantially similar. Moreover, MED-Project and the other program operator coordinate in other local California jurisdictions and materials with the result being the materials are substantially similar. For example, from annual reports and plans in San Mateo from both program operators show that key information on kiosk signage is nearly identical and key information on pamphlets is substantially similar including titles, disposal options, instructions for checking the package, context for importance of safe-drug disposal, and accepted/not accepted information. MED-Project will review all outreach materials at least every two years and will update as necessary based on the review, as requested by Section III.3.b. of the Guidance. With regards to Section III.3.c., and as discussed in response to Condition #2, above, MED-Project will provide guidance and training materials to host sites and vendors and will provide for regular inspections confirming that host sites are following all applicable laws and training requirements.

MED-Project will integrate the promotion goals outlined in Section III.4. of the Guidance into the Plan update and will meet such goals via the Terms of Coordination discussed above in response to Condition #7 and attached as Attachment D.

MED-Project again appreciates the conditional approval of its April 19, 2023 Stewardship Plan, and looks forward to continuing to operate a safe and effective drug takeback program for the residents of San Mateo County.

Sincerely yours,



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

CC: Louise F. Rogers, Chief, San Mateo County Health
Charles Ice, Deputy Director, San Mateo County Environmental Health
Liliana Mejia, Program Supervisor, San Mateo County Environmental Health

Attachment A

San Mateo GIS Five Mile Radius Map

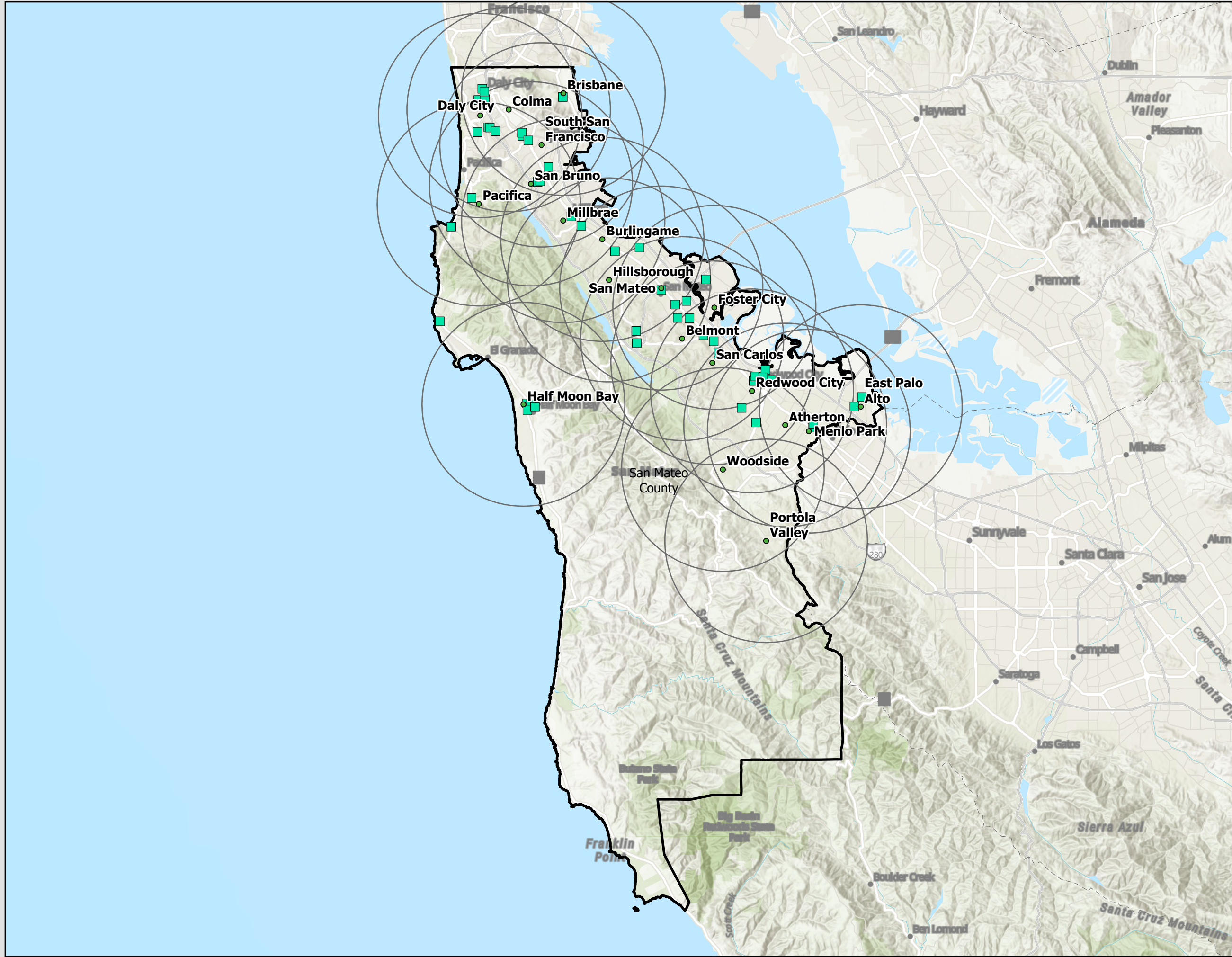
SAN MATEO COUNTY

Legend

- Existing Meds Kiosks
- 5-mile Buffer

Count of Kiosks w/in 5 Miles

Cities	Kiosks
Belmont	20
Brisbane	16
Burlingame	11
Daly City	17
East Palo Alto	6
Foster City	19
Half Moon Bay	4
Menlo Park	12
Millbrae	12
Pacifica	14
Redwood City	15
San Bruno	18
San Carlos	20
San Mateo	15
South San Francisco	19
Towns	
Atherton	14
Colma	17
Hillsborough	12
Portola Valley	0
Woodside	7



Attachment B

San Mateo HPI Analysis

SAN MATEO COUNTY

Tracts: 6102.01, 6102.03, 6104, 6105, 6106.01, 6108, 6117, 6118, 6120, 6121

Legend

■ Existing Meds Kiosks

Healthy Places Index

Percentile

■ 0.00 - 0.25

■ 0.25 - 0.50

Population coverage

Pop w/in 0.5 miles

● 34.2 %

Pop w/in 0.5 - 1 miles

● 39.4 %

Pop w/in 1 - 1.5 miles

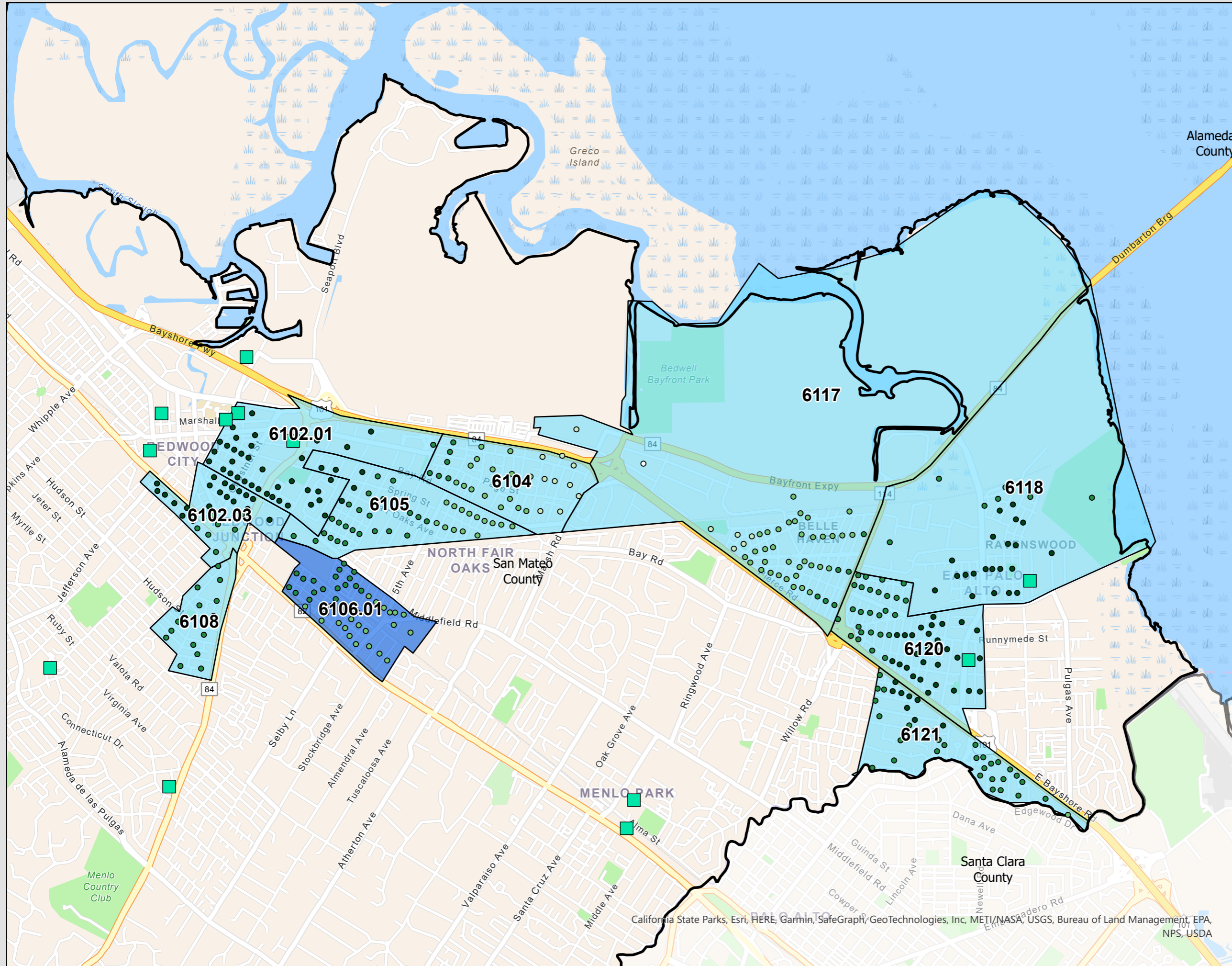
● 21.0 %

Pop w/in 1.5 - 2 miles

○ 5.3 %

Pop w/in 2 - 2.5 miles

○ <0.1 %



California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA



SAN MATEO COUNTY

Tracts: 6008

Legend

 Existing Meds Kiosks

Healthy Places Index

Percentile

 0.00 - 0.25

 0.25 - 0.50

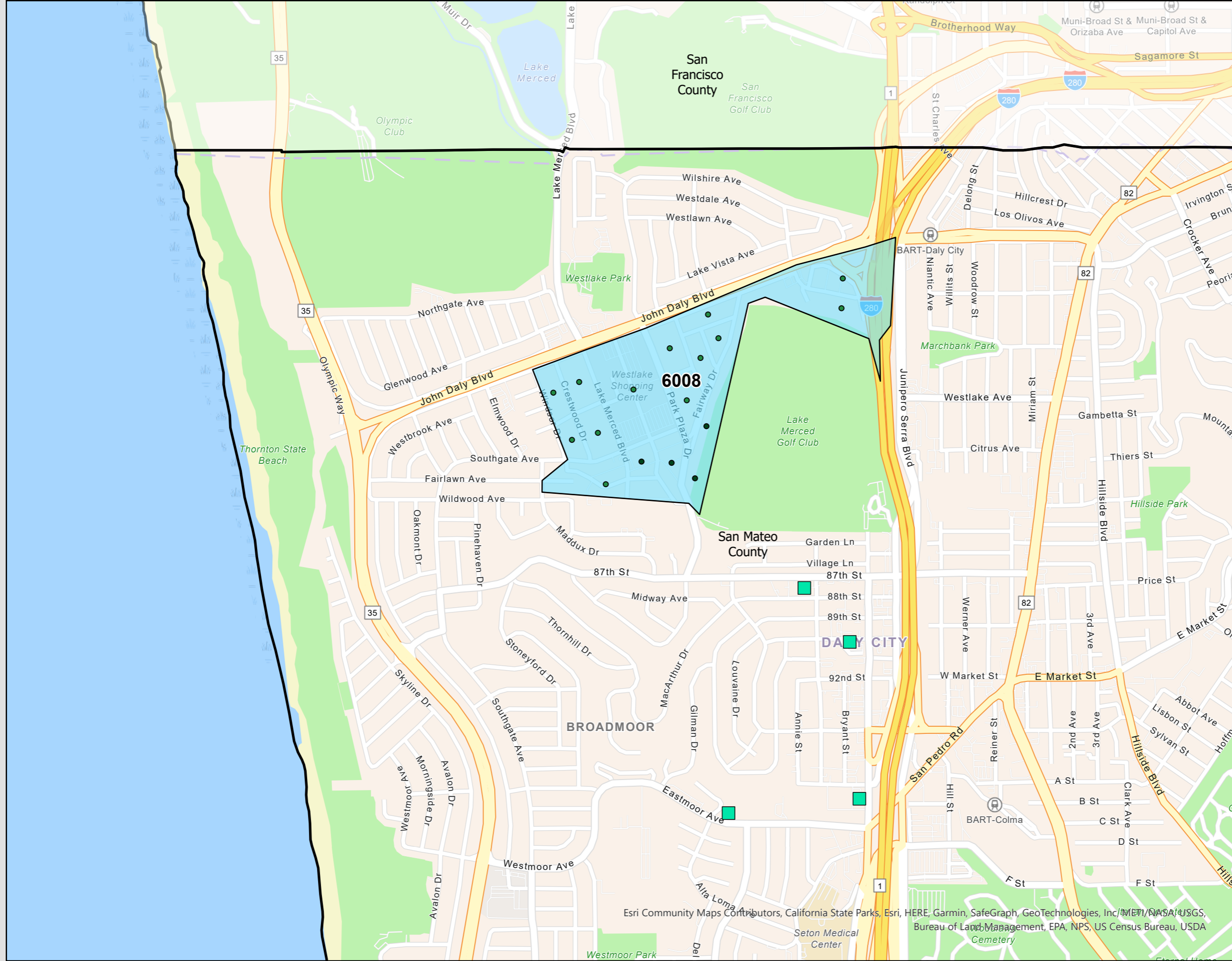
Population coverage

Pop w/in 0.5 miles

 16 %

Pop w/in 0.5 - 1 miles

 84 %



Attachment C

MED-Project Pan Modification Request & Approval

April 1, 2021

SENT VIA ELECTRONIC MAIL

Helen Godinez
County of San Mateo
Environmental Health Services
2000 Alameda de las Pulgas Suite 100
San Mateo, CA 94403
PollutionPrevention@smcgov.org

Re: Change Request for Non-Substantial and Substantial Modifications of the Plan

Dear Ms. Godinez,

MED-Project LLC ("MED-Project") is submitting this letter to the County of San Mateo Environmental Health Division (the "Department") to notify it of non-substantial modifications and request approval of substantial modifications to Section X of the MED-Project Product Stewardship Plan for Unwanted Medicine from Households dated April 15, 2019 (the "Plan"). These modifications will increase disposal options available to "Kiosk Drop-Off Site Hosts" (as defined in the Plan).

Standard for Non-Substantial Plan Modification

The County of San Mateo Safe Medicine Disposal Ordinance, San Mateo County Ordinance Code Title 4, Sections 4.116.010-4.116.190 (the "Ordinance") provides that: "A producer or group of producers or stewardship organization participating in an approved stewardship plan shall notify the Director at least 15 days before implementing any changes to drop-off site locations, methods for scheduling and locating periodic collection events, or methods for distributing prepaid, preaddressed mailers, that do not substantively alter achievement of the service convenience goal under Section 4.116.050(b)(1) of this chapter, or other changes that do not substantively alter plan operations under subsection (a) of this Section 4.116.120." *See* Ordinance §4.116.120(d)

MED-Project is notifying the Department of a non-substantial Plan modification regarding the addition of Section X Carriers and Transporters, and one additional Reverse Distributor, as listed in Attachment A.

Standard for Substantial Plan Modification

The Ordinance provides that: "Proposed changes to an approved stewardship plan that substantively alter plan operations, including, but not limited to, changes to participating manufacturers, collection methods, achievement of the service convenience goal, policies and procedures for handling unwanted covered drugs, or education and promotion methods or disposal facilities, must be approved in writing by the Director before the changes are implemented. *See* Ordinance § 4.116.120(a).

MED-Project is requesting an additional modification be approved consistent with § 4.116.070 (a), which requires that, "[c]overed drugs collected under a stewardship plan be disposed of at a permitted hazardous waste disposal facility as defined by the United States Environmental Protection Agency under 40 C.F.R. parts 264 and 265."

MED-Project requests the Department approve the use of additional permitted hazardous waste incinerators to add to those listed in Section X of the Plan for all unwanted medicine collected by the program. *See Attachment B; Adding hazardous waste incineration facilities to dispose of unwanted medicine from Technician-Assisted Collection, Host-Assisted Collection, Standard Mail-Back Packages, Injector Mail-Back Packages, and Inhaler Mail-Back Packages.*

Accordingly, MED-Project requests written approval of these substantial Plan modifications.

Update of Section X of the Plan

MED-Project is submitting a fully updated list of vendors, carriers, transporters, and disposal facilities incorporating the approved vendors, combined with the vendor modifications, as Attachment C. Attachment C will replace section X of the Plan upon approval of the substantial changes by the Department. Please note that Appendix C is a consolidation of all the changes, but it is not itself a substantial Plan modification. Attachment D contains Appendix M modifications listing the penalty records for the new reverse distributor, carriers and transporters, and disposal facilities as described in Attachments A and B.

MED-Project looks forward to continuing to work with the Department to operate the Plan. Please let me know if you have any questions about this letter.

Sincerely yours,



Dr. Victoria Travis, PharmD, MS, MBA
National Program Director

Attachment A

Non-substantive additions to section X of the Plan.

B. Reverse Distributor Facility

Name	Address	Phone	Website	Type	Penalty Record (5 years)
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	See Appendix M

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	Carrier	None
Covanta Environmental Solutions dba Chesapeake Waste Solutions, LLC.	5300 N 33rd St. Milwaukee, WI 53209	(336) 683-0809	www.covanta.com	Carrier	None
EMS Dispatch, Inc.	316 W Mt Vernon St, Lansdale, PA 19446	(717) 689-5129	https://www.facebook.com/pages/Ems-Dispatch/137953629908858	Contract Carrier	None

Name	Address	Phone	Website	Type	Penalty Record (5 years)
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
Waste Recovery Solutions, LLC	343 King St, Myerstown, PA 17067	(336) 683-0809	www.covanta.com	Hazardous Waste Transporter	None

Attachment B

Substantive modifications to section X of the Plan.

Adding hazardous waste incineration facilities to dispose of unwanted medicine from Technician-Assisted Collection, Host-Assisted Collection, Standard Mail-Back Packages, Injector Mail-Back Packages, and Inhaler Mail-Back Packages.

D. Disposal Facilities

Name	Address	Phone	Website	Type	Penalty Record (5 years)
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 M
Ross Incineration Services, Inc.	36790 Giles Road, Grafton, OH 44044	(440)-748-5800	http://www.rossenvironmental.com/	Hazardous Waste Incinerator	See Appendix M

Attachment C

The new fully integrated table to replace section X of the Plan.

X. Vendors, Transporters, and Disposal Facility Information

A. Vendors

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.	20501 Katy Freeway, Suite 206, Katy, TX 77450	(877) 765-3030	http://pureway.com/	Vendor	None
Stericycle Specialty Waste Solutions, Inc.	2850 100th Court NE, Blaine, MN 55449	(612) 285-9865	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	See Appendix M
Covanta Manheim, Pennsylvania Facility	190 Shellyland Road, Manheim, PA 17545	(717) 653-8882	www.covanta.com	DEA Registered Collector and Reverse Distributor	None
Stericycle, Inc., Indianapolis, Indiana Facility	2670 Executive Drive, Suite A, Indianapolis, IN 46241	(317) 275-7530	www.stericleenvironmental.com	DEA Registered Reverse Distributor	See Appendix M

Name	Address	Phone	Website	Type	Penalty Record (5 years)
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	See Appendix M

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	Carrier	None
Covanta Environmental Solutions dba Chesapeake Waste Solutions, LLC.	5300 N 33rd St. Milwaukee, WI 53209	(336) 683-0809	www.covanta.com	Carrier	None
Doncin Transport, Inc.	3478 Sunnyside Rd, Manheim, PA 17545	(602) 344-4536	http://www.truckdrivingcdljobs.com/in/Pennsylvania/Manheim/DONCIN%20TRANSPORT%20INC.php	Contract Carrier	None

Name	Address	Phone	Website	Type	Penalty Record (5 years)
EMS Dispatch, Inc.	316 W Mt Vernon St, Lansdale, PA 19446	(717) 689-5129	https://www.fac ebook.com/page s/Ems-Dispatch/137953629908858	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 Specialty Waste Solutions, Inc.	2850 100th Court NE, Blaine, MN 55449	(612) 285-9865	www.stericyclee nvironmental.com	Hazardous Waste Transporter	None
Tri-State Motor Transit Co.	8141 E 7th St, Joplin, MO 64801	(877) 860-1600	https://tristatesecured.com/	Hazardous Waste Transporter	None

Name	Address	Phone	Website	Type	Penalty Record (5 years)
United Parcel Service, Inc.	55 Glenlake Parkway NE, Atlanta, GA 30328	(800) PICK-UPS	www.UPS.com/	Common Carrier	UPS advises that "all material government investigation and enforcement activity is provided in our SEC filings at investors.ups.co"
United States Postal Service	475 L'Enfant Plaza SW, Washington, DC 20260	(202) 268-2000	www.USPS.com/	Common 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 M

Name	Address	Phone	Website	Type	Penalty Record (5 years)
Covanta Marion, Inc	4850 Brook Lake Rd., NE, Brooks, OR 97305	(503) 393-0890	https://www.covanta.com/where-we-are/our-facilities/marion	Municipal Waste Combustor	None
Curtis Bay Energy, LP	3200 Hawkins Point Road, Baltimore, MD 21226	(855) 228-1715	www.curtisbayenergy.com	Medical Waste Incinerator	See Appendix M
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 M
Huntsville Solid Waste Disposal Authority	5251 Triana Blvd SW, Huntsville, AL 35805	(256) 882-1019	https://www.covanta.com/Our-Facilities/Covanta-Huntsville	Municipal Waste Combustor	None
Lancaster County Waste to Energy Facility	1911 River Road, Bainbridge, PA 17502	(717) 397-9968	www.covanta.com	Municipal Waste Combustor	See Appendix M
Ross Incineration Services, Inc.	36790 Giles Road, Grafton, OH 44044	(440)-748-5800	http://www.rossenvironmental.com/	Hazardous Waste Incinerator	See Appendix M

Name	Address	Phone	Website	Type	Penalty Record (5 years)
Stericycle, Inc., Warren, Ohio Facility	1901 Pine Avenue SE, Warren, OH 44483	(330) 393-0370	https://www.stericycle.com/services-locations/ohio/warren	Medical Waste Incinerator	See Appendix M
Veolia – Port Arthur	7665 Highway 73, Beaumont, TX 77705	(409) 736-2821	www.veoliana.com	Hazardous Waste Incinerator	See Appendix M
York County Resource Recovery Facility	2651 Blackbridge Road, York, PA 17406	(717) 843-2902	www.covanta.com	Municipal Waste Combustor	See Appendix M

Attachment D

Penalty records for facilities added to section X of the Plan. These should be included in Appendix M of the Plan.

Appendix M: Penalty Records

Clean Harbors Aragonite, LLC Enforcement Action Summary Report



Enforcement Action Summary Report

Facility		Aragonite					
Date Recieved	Agency	Enforcement Type	Alleged Violation	Proposed Penalty	Status	Resolution Date	Penalty Paid
10/20/2016	UDEQ	Notice of Violation	1) Storage facility for water supply had a leak at the time of inspection, 2) the public water supply storage vessel showed signs of a leak.	\$0.00	Resolved w/o Penalty	12/14/2016	\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>		Repaired the tanks.		
2/8/2017	UDEQ - DDW	Notice of Violation	Failure to monitor and report for pesticides and volatile organic compounds in 2016.	\$0.00	Resolved w/o Penalty	2/15/2017	\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>		Updated testing was conducted.		
5/16/2018	UDEQ - Division of Air Quality	Notice of Violation	Failure to submit stack test results, deviation reports, leak detection and repair reports, Benzene NESHAP reports, semi-annual reports and compliance certifications in a timely manner.	\$23,750.00	Resolved	5/21/2018	\$23,750.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>				
1/28/2019	US DEA	Notice of Violation	1) Failure to file annual inventory, 2) delinquent filing of quarterly ARCOS reports, failure to maintain a separate file for Schedule 1 and 2 and Schedule 3 through five controlled substances, 4) failure to record time of annual inventory.	\$120,000.00	Resolved	5/8/2019	\$96,000.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>		Payment of a civil penalty.		

Covanta Environmental Solutions, LLC Penalty Record

Date	Statute	Source ID	Compliance Monitoring Type	Lead Agency	Violation
5/15/18	RCRA	INR000144303	Compliance Evaluation Inspection On-Site	State	279.F: Used Oil – Processors and Re-refiners

Curtis Bay Energy Penalty Record

Qtr10Value	Qtr11Value	Qtr12Value	Qtr13Value
2019-10-01 - 2019-12-31	2020-01-01 - 2020-03-31	2020-04-01 - 2020-06-30	2020-07-01 - 2020-12-04
Significant/Category I Noncompliance	Significant/Category I Noncompliance	Significant/Category I Noncompliance	Undetermined
Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Failure to Report DMR - Not Received	Not applicable

Heritage Thermal Services – Ohio Penalty Record

Type of Action	Date	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
NOV	5/17/2019	DAPC	HTS exceeded THC 1-hr rolling.		Closed – Abatement was completed prior to NOV letter.
NOV	2/27/2019	DAPC	HTS exceeded THC 1-hr rolling.		Closed – Abatement was completed prior to NOV letter.
NOV	11/2/2018	US EPA	HTS failed to provide necessary information on labels for satellite drum and slag trailer.		Closed - HTS abated the issue while inspector was on-site. This is noted in the NOV letter.
NOV	8/10/2018	DAPC	HTS exceeded THC 1-hr rolling.		Closed - HTS to respond within 30 days with corrective action plan. HTS responded in letter dated 9/5/18.
NOV	5/30/2018	DAPC	HTS exceeded THC 1-hr rolling average on March 25, 2017 (Title V).		Closed - HTS to respond within 30 days with corrective action plan. HTS responded in letter dated 6/21/18.

Type of Action	Date	Regulatory Body/Agency	Description of Alleged Violation	Fine Amount	Final Disposition
NOV	2/23/2018	DAPC	HTS exceeded THC 1-hr rolling average.	NA	Closed - HTS to respond within 30 days with corrective action plan. HTS responded in letter dated 3/21/18. HTS received ROV (Resolution of Violation) in letter dated 4/3/18.
NOV	5/26/2017	DAPC	HTS exceeded THC 1-hr rolling average on March 25, 2017 (Title V).	NA	Closed – OEPA issued resolution of violation letter on 7/11/17.
NOV	2/12/2016	OSHA	Failure to ensure employee was wearing proper PPE.	\$27,720	Closed – HTS settled this matter on October 14, 2016.

Lancaster County Waste to Energy Facility Penalty Record

Date	Type	Summary	Agency	Status Type	Source ID
11/27/2019	CAA	Violation Identified	PA	Federally Reportable Violations	PA000245684
06/07/2017	CAA	Violation Identified	PA	Federally Reportable Violations	PA000245684
08/4/2016	CAA	Violation Identified	PA	Federally Reportable Violations	PA000245684

Ross Incineration Services Penalty Record

RCRA Violations							
Source ID	Registry ID	Status Type	Violation	Activity Location	Agency	Violation Type	Violation Date
OH0000000247050278	110000385592	Federally Reportable Violations	Violation Identified	n/a	OH	n/a	03/06/2020
OHD048415665	110000385592	Violation	TSD - Container Use and Management	OH	OH	264.I	11/16/2018
OHD048415665	110000385592	Violation	Generators - Pre-transport	OH	OH	262.C	03/12/2019
OHD048415665	110000385592	Violation	TSD IS-Container Use and Management	OH	OH	265.I	06/25/2018
OHD048415665	110000385592	Violation	TSD - Container Use and Management	OH	OH	264.I	11/14/2017
OHD048415665	110000385592	Violation	TSD - Container Use and Management	OH	OH	264.I	03/12/2018
OHD048415665	110000385592	Violation	TSD IS-Container Use and Management	OH	OH	265.I	03/13/2017
OHD048415665	110000385592	Violation	TSD - Preparedness and Prevention	OH	OH	264.C	03/13/2017

RCRA Violations							
Source ID	Registry ID	Status Type	Violation	Activity Location	Agency	Violation Type	Violation Date
OHD048415665	110000385592	Violation	TSD - Manifest/Records/Reporting	OH	OH	264.E	11/14/2017
OHD048415665	110000385592	Violation	Permit Condition or Requirement	OH	OH	PCR	12/16/2016
OHD048415665	110000385592	Violation	TSD - Incinerator Standards	OH	OH	264.O	12/16/2016
OHD048415665	110000385592	Violation	TSD - Incinerator Standards	OH	OH	264.O	11/17/2016
OHD048415665	110000385592	Violation	Permit Condition or Requirement	OH	OH	PCR	11/17/2016
OHD048415665	110000385592	Violation	TSD - Manifest/Records/Reporting	OH	OH	264.E	11/16/2018
OHD048415665	110000385592	Violation	TSD - Preparedness and Prevention	OH	OH	264.C	11/16/2018
OHD048415665	110000385592	Violation	TSD - Container Use and Management	OH	OH	264.I	11/16/2018

Stericycle, Inc., Indianapolis, Indiana Facility Penalty Record

Date	Type	Summary	Violation Detail	Corrective Action Completion Date	Return to Compliance	Corrective Action
6/15/2017	RCRA	Inventory weight discrepancy	Discrepancy on the haz waste inventory log	6/15/2017	6/15/2017	Violation corrected during audit, no further action required
3/29/2017	RCRA	Inventory weight discrepancy	Discrepancy on the haz waste inventory log	3/29/2017	3/29/2017	Violation corrected during audit, no further action required
3/29/2017	RCRA	Hazardous waste labeling	Containers missing date	3/29/2017	3/29/2017	Violation corrected during audit, no further action required
7/25/2016	RCRA	Inventory dates	Inventory dates and physical dates on containers did not match	8/24/2016	10/25/2016	Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter

Stericycle, Inc., Warren, Ohio Facility Penalty Record

Source ID	Statute	Violation Type	Agency	Programs	Pollutants	Violation Date
OH0000000278080634	CAA	FRV	OH	CAANSPS, CAASIP, CAATVP	FACIL	10/20/2018

Veolia – Port Arthur Penalty Record

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
1/17/2019	CAA	TCEQ	<ol style="list-style-type: none"> 1) Failure to maintain tons per year emissions for permitted sources on a 12-month rolling period basis. 2) Failure to maintain the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS) equipment. 3) Failure to comply with the EPA and the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS) equipment. 4) Failure to comply with the EPA minimum kilovolts-amps requirement at the Wet Electrostatic Precipitator (WESP). 5) Failure to maintain the CO emission rate at the Incinerator (EPN INCINSTK). 6) Failure to limit Carbon Monoxide concentration to 100 parts per million by volume (ppmv) at the Incinerator. 7) Failure to maintain Incinerator minimum combustion temperatures. 8) Failure to certify the Permit Compliance Certification. 9) Failure to report all instances of deviations. 	<p>3/18/2019: Received NOV letter</p> <p>4/25/2019: Submitted Corrective Action Plan</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
8/21/2018	Drinking Water	TCEQ	Monitoring Violations 1) Paperwork Error on the Chain of Custody	8/30/2018: Received a Monitoring Violation: Revised Coliform Rule 10/19/2018: Posted required public notice in all Veolia Port Arthur Buildings 10/22/2018: Submitted copy of Monitoring Violation Public Notice and Certificate of Delivery to TCEQ. No further action required.

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
6/13-21/2018	RCRA	TCEQ	<p>Alleged Violations:</p> <ol style="list-style-type: none">1) Failure to maintain inspection records as required by permit.2) Failure to Maintain aisle space to allow unobstructed movement of personnel and emergency response equipment. <p>Additional Issues:</p> <ol style="list-style-type: none">3) A concern the regulated entity may not be meeting the requirements of properly maintaining an accurate storage inventory amount.4) The concern is the regulated entity may not be meeting the requirements of properly storing incompatible waste.	<p>9/21/2018: Submitted a response to TCEQ.</p> <p>1/4/2019: Received Letter from TCEQ stating no further action required.</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
2/22/2018	OPCC	TCEQ	<ol style="list-style-type: none"> 1) Failure to maintain the CO emission rate at the Incinerator. 2) Failure to limit Carbon Monoxide concentration at 100 parts per million by volume (ppmv) at the Incinerator. 3) Failure to maintain Incinerator minimum combustion temperatures. 4) Failure to maintain Beryllium, Selenium, and Chromium emission rates at the Incinerator. 5) Failure to limit combined Arsenic-Beryllium-Chromium emissions at the Incinerator. 6) Failure to maintain Mercury emission rates at the Incinerator. 7) Failure to limit Mercury emissions at the Incinerator. 8) Failure to maintain the Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber. 9) Failure to maintain EPA and Hazardous Waste Permit minimum voltage requirements at the Ionizing Wet Scrubber (IWS) equipment. 	<p>4/26/2018: Received Notice of Violation.</p> <p>5/25/2018: Submitted a Response to NOV.</p> <p>10/15/2018: Received a letter from TCEQ stating no further action required.</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
6/15/2017	TPDES	TCEQ	No Violations - Three Areas of Concern	8/9/2017: Received a letter from the TCEQ stating no violations are alleged.
3/9/2017	CAA	TCEQ	<ol style="list-style-type: none"> 1) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour at the incinerator. 2) Failure to maintain Carbon Monoxide emissions of 100 parts per million by volume (ppmv) at the incinerator. 3) Failure to maintain incinerator minimum combustion temperatures. 4) Failure to maintain Arsenic and Chromium emission rates at the Incinerator. 5) Failure to maintain combined Cadmium-Lead and combined Arsenic-Beryllium-Chromium emissions at the Incinerator. 6) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour during start-up at the Incinerator. 	<p>4/18/2017: Received NOV</p> <p>5/27/2017: Submitted Corrective Action Plan</p> <p>9/29/2017: Received a letter from the TCEQ stating adequate compliance documentation was received and no further action required</p>

Inspection Date	Type of inspection	Name of inspector and Regulatory Agency	Alleged Violations	VEOLIA Responses and/or Corrective Actions Taken
4/6/2016-5/16/2016	RCRA	TCEQ	<ol style="list-style-type: none">1) Failure to maintain hazardous waste tanks inspection records.2) Failure to maintain a current NOR status of INACTIVE for hazardous waste tanks inspection records.3) Failure to include on the emergency equipment list, One Self-Contained Breathing Apparatus (SCBA) located at the onsite Response Office.4) Failure to have legible posted signs with the legend Danger-Unauthorized Personnel Keep Out.5) Failure to have adequate security to prevent unknowing site entry.	<p>7/26/2016: Received NOV</p> <p>8/25/2016: Submitted Corrective Action Response/Received 8/29/2016</p> <p>3/1/2017: Received a letter from the TCEQ stating no further action required</p>

York County Resource Recovery Facility Penalty Record

Date	Air Program	Statute	Agency	Status Type	Source ID	Registry ID
11/27/2019	CAASIP	CAA	PA	Federally Reportable Violations	PA000471126	110001220492
04/06/2018	CAASIP	CAA	PA	Federally Reportable Violations	PA000471126	110001220492



COUNTY OF SAN MATEO

Heather Forshey, MS, REHS
Director

Environmental Health Services
San Mateo County Health
2000 Alameda de las Pulgas
Suite 100
San Mateo, CA 94403
smchealth.org

December 9, 2021

Dr. Victoria Travis, PharmD, MS, MBA
National Program Director, MED-Project, LLC
1800 M Street, NW Suite 400S
Washington, DC 20036

Dear Ms. Travis,

This letter is to notify MED-Project that your request for approval of substantive changes to the ED-Project Product Stewardship Plan for Unwanted Medicine from Households dated April 15, 2019 (the "plan") received on April 1, 2021, has been approved.

Per your request, Heritage Thermal Services- Ohio and Ross Incineration Services have been approved as disposal facilities since these are permitted hazardous waste disposal facilities as required in section 4.116.070 of the San Mateo County Ordinance No. 04736.

Please contact Liliana Mejia at (650)339-9701 if you have any questions or concerns.

Sincerely,

Heather Forshey, MS, REHS
Director, Environmental Health Services



**SAN MATEO
COUNTY HEALTH**

Attachment D

Draft Terms of Coordination

**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.