

Deborah O. Raphael Director

## Notice of Determination - Product Stewardship Plan Review

San Francisco Safe Drug Disposal Stewardship Ordinance

(Ordinance No. 31-15, San Francisco Environment Code, Chapter 22, Section 2200 through 2219)

- PLAN NAME: San Francisco MED-Project, A Product Stewardship Plan for Unwanted Medicine from Households, as revised, July 14, 2016
- PLAN OPERATOR: San Francisco MED-Project, LLC Carrie Hoffman, Plan Development Director 1800 M Street NW, Suite 4005 Washington, DC 20036 202-580-6291 choffman@amsnavista.com

#### DETERMINATION:

The San Francisco MED-Project Stewardship Plan dated July 14, 2016, is APPROVED subject to the following conditions:

1. Within 120 days of this determination, the Producers represented by the San Francisco MED-Project (MED-Project) shall propose, through their Plan Operator, a Supplemental Stewardship Plan including all the components of Environment Code Section 2204 for collection and disposal of the items below. The Supplemental Stewardship Plan shall be subject to review and approval under Environment Code Section 2211.

- a. preloaded self-injection devices which contain a covered drug
- b. inhaler devices which contain a covered drug
- c. non-empty aerosol containers which contain a covered drug
- d. iodine containing medications

2. Within 60 days of approval of the supplemental Stewardship Plan required in Condition 1, the Producers represented by the MED-Project shall operate, through their Plan Operator, the approved supplemental Stewardship Plan in accordance with Environment Code Chapter 22.

3. Collection kiosks shall be installed and in operation by 90 days after signed agreements are obtained with kiosk drop-off sites.

4. Mail-back package services shall be featured as a collection or disposal option in the system of promotion required in Environment Code Section 2206, including but not limited to the toll-free telephone number, web site, and education and outreach materials. Mail-back Package Distribution Points shall be included

in the system of promotion as long as mail-back package distribution points are used to meet the convenience goal specified in Environment Code Section 2205(b)(1).

5. The dimensions or capacity of mail-back packages shall be specified on the web-based Mail-Back order form, and incorporated into the call center's interactive voice response system script, live operator call script, and live operator training.

6. Call center operators shall respond to voicemail messages left through the interactive voice response system within one business day.

7. By one year after the effective date of this determination, the Producers represented by the MED-Project shall submit, through their Plan Operator, an updated Stewardship Plan to the Director. The Director shall review the updated Stewardship Plan according to all requirements in Environment Code Chapter 22 and any regulation adopted pursuant to the Ordinance.

The above conditions of approval shall be incorporated in the Stewardship Plan approved by this Notice of Determination. In the event that any of the above conditions of this determination are not met, the Producers represented by the San Francisco MED-Project are in violation of Environment Code Chapter 22 and subject to the provisions of Environment Code Section 2213, unless otherwise determined by the Director in her sole discretion.

Signed:

Plan Approval Date: 725 16

Deborah O. Raphael Director San Francisco Department of the Environment San Francisco Safe Drug Disposal Stewardship Ordinance

City and County of San Francisco, Ordinance No. 31-15, San Francisco Environment Code, Chapter 22, Sections 2200-2219

# Product Stewardship Plan Evaluation: San Francisco MED-Project

Section 2204. Stewardship Plans - Components					
Ordinance Section	Requirement	Meets Req. (Y/N)	Issue/Information Requested		
Sections 2204(a-h)	Each Stewardship Plan shall include:				
2204(a)	Contact information (name, address, phone number, email address) for all Producers participating in the Stewardship Plan and the contact information for a point of contact for each Producer.	Y	<u>April 25 version:</u> Participants in MED-Project will be provided on an on-going basis (pg. 31).		
2204(b)	<ul> <li>A description of the proposed collection system to provide convenient ongoing collection service for all unwanted covered drugs from City residents in compliance with the provisions and requirements in Section 2205, including a: <ul> <li>list of all collection methods and participating collectors</li> <li>list of drop-off sites a description of how any periodic collection events will be schedule and located</li> <li>description of how any mail-back services will be provided and an example of the prepaid, preaddressed mailers the plan will use</li> <li>list of retail pharmacies and law enforcement agencies contacted by the plan under Section 2203(d)(2)</li> <li>list of all collectors who offered to participate</li> </ul> </li> </ul>	N	<ul> <li><u>April 25 version:</u> <ul> <li>a. Provide a detailed timeline for plan implementation.</li> <li>b. Proposed plan does not include certain items that meet the definition of "Covered Drug" under the Ordinance (pg. 6 – xiii, xiv). A Memo from Carrie Hoffman, dated June 6, 2016 (Attachment A), further excludes aerosols, which can meet the definition of "Covered Drug." These items and their collection and disposal method need to be addressed.</li> <li><u>July 14 version:</u> <ul> <li>a. Requested information was provided (pg. 41).</li> <li>b. Issue was not addressed (pg. 6 – vi, vii, xv, xvi). Aerosols, inhalers, iodine containing medications, pre-loaded products with a sharp attached containing prescription or over the counter medications, and auto injector meet or can meet the definition of a Covered Drug. In the letter from Carrie Hoffman to Maggie Johnson, dated July 14, 2016 (Attachment B), MED-Project is requesting an extension until October 14, 2016 to address preloaded products with a sharp and auto injectors. Other excluded items that meet or can meet the definition of a Covered Drug need to be addressed.</li> </ul> </li> </ul></li></ul>		
2204(c)	A description of the handling and disposal system, including identification of and contact information for collectors, transporters and waste disposal facilities to be used in accordance with Sections 2205 and 2207.	Ŷ	April 25 version:a. Provide additional info for Covanta Facility used for mail-back packages.July 14 version:a. Requested info was provided (Attachment C).		
2204(d)	A description of the policies and procedures to be followed by persons handling unwanted collected drugs, including a description of how all collectors, transporters and waste disposal facilities used will ensure that the collected unwanted covered drugs are safely and securely tracked from collection	Y	<ul> <li><u>April 25 version:</u></li> <li>a. Kiosk Collection Section (pg. 13) and Standard Operating Procedures (pg. 47) can be revised to reflect DEA regulations that state the installation and removal of an inner liner can be performed by or under the supervision of at least two employees of the authorized collector.</li> </ul>		

	through final disposal, and how all entities participating in the Stewardship Plan will operate under and comply with all applicable federal state laws, rules and guidelines.		<ul> <li>July 14 version:</li> <li>a. Kiosk Collection Section (pg. 13) and Standard Operating Procedures (pg. 50) have not been revised to reflect DEA regulations that state the installation and removal of the inner liner can be performed by or under the supervision of at least two employees of the authorized collector.</li> </ul>
2204(e)	A certification that any patient information on drug packaging will be promptly destroyed.	Y	
2204(f)	A description of the public education effort and promotion strategy required in Section 2206, including a copy of standardized instructions for City residents, signage developed for collectors, and required promotional materials.	Y	
2204(g)	Proposed short-term and long-term goals of the Stewardship Plan for collection amounts, education and promotion.	Y	<ul> <li><u>April 25 version:</u> <ul> <li>a. Proposed goals (pg. 19) should include a specific and measurable number for items discussed.</li> <li><u>July 14 version:</u> <ul></ul></li></ul></li></ul>
2204(h)	A description of how the Stewardship Plan will consider (1) use of existing providers of waste pharmaceutical services; (2) separating covered drugs from packaging to the extent possible to reduce transportation and disposal costs; and (3) recycling of drug packaging to the extent feasible.	Y	<ul> <li><u>April 25 version:</u> <ul> <li>a. Packaging Section (pg. 28) does not consider the recycling of drug packaging to the extent feasible. Outreach materials and signage can promote the recycling of drug packaging.</li> <li><u>July 14 version:</u> <ul></ul></li></ul></li></ul>
	Section 2205. Stewardship	Plans – (	
Sections 2205(b)(1-5)	The collection system for each Stewardship Plan shall:		
2205(b)(1)	Provide reasonably convenient and equitable access for all City residents in all supervisorial districts. The system of drop-off sites shall provide at least five drop-off sites in every supervisorial district, geographically distributed to provide reasonably convenient and equitable access. If the service convenience goal cannot be achieved due to a lack of drop-off sites at pharmacies, law enforcement agencies, or other qualified collectors in each supervisorial district, then those areas shall be served through periodic collection events and/or mail-back services.	Ν	<ul> <li><u>April 25 version:</u> <ul> <li>a. In the event that the convenience goal is not met, an annual take-back event (pg. 15) in a supervisorial district is not sufficient to provide convenient and equitable access. Propose a more convenient and equitable schedule for take-back events.</li> <li>b. Proposed mail-back package size (pg. 19) and system to request packages (pg. 99) do not provide convenient and equitable access. Revise plan to provide larger package sizes or allow residents to easily request more than one package.</li> <li><u>July 14 version:</u></li> <li>a. A new schedule of take-back events and mail-back package distribution locations was proposed (pg. 19). If agreements cannot be reached with an LEA to participate in take-back events, adding one additional mail-back package distribution location is likely not sufficient to provide reasonably convenient and equitable access.</li> <li>b. Larger package sizes and the ability to easily request more than one package is still not available, though the Plan was revised to state residents can enter information again to request multiple packages (pg. 102). Given</li> </ul> </li> </ul>

			<ul> <li>that larger package sizes are not being made available, an easier option to request more than one package would be ideal, i.e. through a drop-down quantity option on the webpage. The size of package is not specified on the sample webpage (pg. 102) or in the sample telephone script (pg.96), which does not allow residents to gauge how many packages are needed. Phone operators should also be trained to ask how much unwanted medicine residents have to gauge the number of mail-back packages to provide.</li> <li>c. Plan states that the "MED-Project will satisfy the service convenience goals in any supervisorial district in which signed agreements have not been attained from a minimum of five kiosk drop-off site hosts through take-back events and the availability of mail-back services (pg. 8)." Signed agreements with potential kiosk drop-off sites does not equate to having established a drop-off site that can be used to meet the convenience goal.</li> </ul>
2205(b)(2)	Be safe and secure, including providing for the prompt destruction of patient information on drug packaging.	Y	
2205(b)(3)	Give preference to having retail pharmacies and law enforcement agencies serve as drop-off sites.	Y	
2205(b)(4)	Include, as collectors, any retail pharmacy or any law enforcement agency willing and able to serve voluntarily as a drop-off site for unwanted covered drugs within three months of their offer to participate, unless the collector requests a longer time frame. A Stewardship Plan may also accept other collectors willing to serve as a drop-off site for unwanted covered drugs and able to meet the requirements.	Y	
2205(b)(5)	Make mail-back services available, free of charge, to disabled and home-bound residents upon request through the Stewardship Plan's toll-free telephone number and web site, and through distribution of prepaid, preaddressed mailers to persons providing services to such residents. The toll-free telephone number and website required shall be in English, Spanish, Chinese, Russian, and Tagalog.	Y	<ul> <li><u>April 25 version:</u> <ul> <li>a. Proposed kiosk signage needs to be translated into the required languages (pg. 50).</li> <li>b. Toll-free phone number script needs to be available in all required languages (pg. 93).</li> </ul> </li> <li><u>July 14 version:</u> <ul> <li>a. Kiosk signage will be translated and is subject to review and approval by the Department of the Environment (pg. 53).</li> <li>b. Toll-free phone number script will be translated to all required languages (pg. 96).</li> </ul> </li> </ul>
2205(c)	All stewardship plans shall jointly operate a drop-off site within each City-owned pharmacy.	Y	
2205(d)	Drop-off sites shall accept all covered drugs from city residents during all hours that the retail pharmacy, law enforcement agency, or other collector is normally open for business with the public. Drop-off sites not operated by a law enforcement agency shall utilize secure collection bins in compliance with all applicable requirements. In the event that more than one	N	<ul> <li><u>April 25 version:</u> <ul> <li>a. See Section 2204(b), April 25 version(b) about not all covered drugs being included in Stewardship Plan. Alternate collection methods need to be proposed.</li> </ul> </li> <li><u>July 14 version:</u> <ul> <li>a. Issue still needs to be addressed.</li> </ul> </li> </ul>

	Stewardship Plan operates a drop-off site at a particular				
	location, each drop-off site must accept all covered drugs. Section 2206. Stev	ardchin	Dians Dromation		
<b>•</b>		-			
Section 2206(a)(1-4)					
2206(a)(1)	Promote the stewardship plans so that collection options for covered drugs are widely understood by residents, pharmacists, retailers of covered drugs and health care practitioners including doctors and other prescribers, veterinarians and veterinary hospitals, and promote the safe storage of covered drugs by City residents.	N	<ul> <li>April 25 version: <ul> <li>a. Outreach materials and website do not appropriately promote the collection options for covered drugs that the plan will provide (pg. 95, 104). At first glance, outreach materials and avenues appear to equate all disposal options. Using a collection kiosk should be promoted above takeback events when Plan is fully operational.</li> <li>b. The outreach materials and website will be promoting the stewardship Plar in San Francisco, so there is no need to include in-home disposal as an option (pg. 95, 104). A General Manager Order was also issued from the San Francisco Public Utilities Commission that bars sewer disposal of all medication in San Francisco (Attachment D).</li> <li>c. Including the availability of mail-back packages to differentially-abled and homebound residents under the In-Home Disposal option (pg. 104) does not promote this collection option so that it is widely understood. Mailback packages should be listed as its own separate option.</li> <li>July 14 version:</li> <li>a. Outreach materials and avenues still equate all disposal options (pg. 98, 109), which does not allow collection options to be widely understood. Ultimately, collection kiosks should ultimately be promoted before takeback events as they will be more permanent and widespread as the plan is implemented (pg. 108). The outreach materials and website should reflect this when stewardship plan is fully operational.</li> <li>b. In-home disposal is still promoted as an option even though there will be other options in San Francisco. The in-home disposal text on the brochure/flyer mockup (pg. 108).</li> <li>d. The Stewardship Plan proposes to make mail-back packages available at distribution locations in the event that the convenience standard is not met (pg. 19). The Plan does not address how this collection option will be promoted if it will be used to meet the convenience goal.</li> </ul> </li> </ul>		
2206(a)(2)	Work with collectors participating in the stewardship plans to develop clear, standardized instructions for City residents on the use of collection bins and a readily-recognizable, consistent	Y	<ul> <li><u>April 25 version:</u></li> <li>a. "Accepted" section of kiosk signage (pg. 52) is not inclusive of all covered drugs.</li> </ul>		
	design of collection bins.		<ul> <li>July 14 version:</li> <li>a. Requested changes were made to "Accepted" section of kiosk signage (pg. 55).</li> </ul>		

2203(a)(3)	Establish a single toll-free telephone number and single web site where collection options and current locations of drop-off sites will be publicized, and prepare educational and outreach materials promoting safe storage of medicines and describing where and how to return unwanted covered drugs to the stewardship plan. These materials must be provided to pharmacies, health care facilities, veterinary facilities, and other interested parties for dissemination to City residents. Plain language and explanatory images should be used to make use of medicine collection services readily understandable by all residents, including individuals with limited English proficiency.	Y	<ul> <li><u>April 25 &amp; July 14 versions:</u> <ul> <li>Plan states a resident will be able to leave a voice message when an operator in unavailable at the call center (pg. 20/22). The Plan does not specify a timeframe when operators will respond to messages.</li> </ul> </li> </ul>
2206(a)(4)	Conduct a biennial survey of City residents and a survey of pharmacists, veterinarians, and health professionals in the City who interact with patients on use of medicines after the first full year of operation of the plans. Survey questions shall measure percent awareness of the stewardship plans, assess to what extent drop-off sites and other collection methods are convenient and easy to use, and assess knowledge and attitudes about risks of abuse, poisonings and overdoses from prescription and nonprescription medicines used in the home. Draft survey questions shall be submitted to the Director for review and comment at least 30 days prior to initiation of the survey. Results of the survey shall be reported to the Director and made available to the public on the required website within 90 days of the end of the survey period. The privacy of all survey respondents shall be maintained.	Y	
2206(b)	All surveys, outreach, education, promotion, websites, and toll- free phone numbers required by this section shall be in English, Spanish, Chinese, Russian, and Tagalog.	Y	April 25 version: a. See Ordinance Section 2205(b)(5), April 25 version issues (b) and (c). July 14 version: a. Requested info was provided.
	Section 2207. Stewardship	Plans – I	
2207(a)	Covered drugs collected under a stewardship plan must 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.	Y	
2207(b)	The Director may grant approval for a stewardship plan to dispose of some or all collected covered drugs at a permitted large municipal waste combustor, as defined by the United States Environmental Protection Agency under 40 C.F.R. parts 60 and 62, if the Director deems the use of a hazardous waste disposal facility described under subsection (a) of this section to be infeasible for the stewardship plan based on cost, logistics or other considerations.	Y	

2207(c)	A stewardship plan may petition the Director for approval to use final disposal technologies that provide superior environmental and human health protection than provided by the disposal technologies in this section, or equivalent protection at lesser cost. The proposed technology must provide equivalent or superior protection in each of the following areas: (1) monitoring of any emissions or 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.	Y	<u>April 25 version:</u> a. See 2204(c) request. <u>July 14 version:</u> a. Requested info was provided.
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Attachment A

San Francisco MED-Project

Medication Education & Disposal

#### MEMORANDUM

Date:June 6, 2016To:Maggie JohnsonFrom:Carrie Hoffman

Re: San Francisco MED-Project LLC Stewardship Plan

Dear Ms. Johnson:

San Francisco MED-Project submitted a Product Stewardship Plan (the "Plan") in compliance with the San Francisco Safe Drug Disposal Stewardship Ordinance, San Francisco Environment Code Chapter 22, Division I, Section 2200-2219 (the "Ordinance") on April 23, 2016. Since the submission of the Plan we learned of guidance from the U.S. Food and Drug Administration ("FDA") and Drug Enforcement Agency ("DEA") requiring amendments to the Plan. To ensure PPSWG is in compliance with this guidance, PPSWG will be re-submitting our Plan to reflect these updates. While these proposed edits are relatively minor, they will require changes to the Plan's content and revisions to signage, brochures, and website material. PPWSG has or will make similar edits to its Product Stewardship Plans in other counties.

The FDA released an update to their "How to Dispose of Unused Medicines" webpage on April 27, 2016<sup>1</sup>. The guidance represents a minor shift in its recommendation on the proper disposal of medicines by adding dirt to their recommendation on home disposal. The guidance now says: "Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds, dirt, or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs) and to place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag."

MED-Project also recently learned of DEA guidance clearly stating aerosols are not permitted in the collection receptacles or mailback packages. This guidance states: "Persons may not dispose of any dangerous, hazardous, or non-compliant items in a collection receptacle or a mail-back package. This includes medical sharps and needles (e.g., insulin syringes), and compressed cylinders or aerosols (e.g., asthma inhaler)".<sup>2</sup> Based on this information, we are adjusting our definition of Unwanted Medicine to exclude aerosols. We are also adding aerosols to the list of items that are not accepted in Kiosks or mail-back packages, or at take-back events.

We hope to submit revisions to the Plan clearly indicating any changes. We can discuss your preferred format more during our call on Wednesday.

Sincerely yours,

Carrie Hoffman

Carrie Hoffman MED-Project

<sup>1</sup> <u>http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm</u>, page last updated 04/27/2016

<sup>&</sup>lt;sup>2</sup> <u>http://www.deadiversion.usdoj.gov/drug\_disposal/fact\_sheets/disposal\_public.pdf</u>

## San Francisco MED-Project

Medication Education & Disposal

San Francisco MED-Project LLC 1800 M Street, NW | Suite 400S | Washington, DC 20036 Phone: (202)495-3131 | Fax: (202)530-0659 ppswg@amsnavista.com

July 14, 2016

Maggie Johnson San Francisco Department of the Environment 1455 Market Street, Suite 1200 San Francisco, CA 94103 safemeds@sfgov.org

Re: MED-Project LLC Stewardship Plan

Dear Ms. Johnson:

MED-Project, LLC, on behalf of the Pharmaceutical Product Stewardship Work Group ("PPSWG"), is submitting updates to its Product Stewardship Plan for the San Francisco Department of the Environment's ("Department's") review under the San Francisco Safe Drug Disposal Stewardship Ordinance, San Francisco Environment Code Chapter 22, Division I, Section 2200-2219 (the "Ordinance"). The participants in the Plan are included in the attached MED-Project Participant List. MED-Project is also submitting the attached Indiana Department of Environmental Management pointof-contact and Covanta Indianapolis permit information to accompany its request for approval to dispose of mail-back packages pursuant to Ordinance Section 2207(b).

MED-Project reviewed your initial comments and updated the Plan accordingly. After careful consideration, MED-Project is addressing two Department comments without substantial revisions to the Plan's text. First, MED-Project considered but declined to offer a mail-back package size in addition to the 8 oz. package. The 8 oz. package has been selected for cost, logistical, and safety reasons. Second, while MED-Project did provide revisions to Plan signage in response to Department comments, MED-Project continues to rely on FDA guidance for proper disposal of Unwanted Medicine.

MED-Project considered how to supplement kiosk collection in Supervisorial Districts where the service convenience goal has not been met and is proposing a combination of Take-Back Events and mail-back package distribution points according to the following formula:

Kiosk Drop-Off Sites	LEA Sponsored Take-Back Events	Mail-back Package Distribution Points
5	0	0
4	Quarterly	0
3	Quarterly	2
2	Quarterly	3
1	Quarterly	4
0	Quarterly	5

# San Francisco MED-Project Medication Education & Disposal

Detailed responses to all other comments are provided below.

San Francisco Feedback	Alameda MED-Project
<b>2203(e)(4)</b> & <b>2204(b)</b> : Timeline for implementation and installation of kiosks is unclear (pg. 18).	Implementation timeline clarified in Plan Sections VI.A.2, VI.C, VI.D.1, and Appendix C.
<b>2204(b)</b> & <b>2205(b)(5)</b> : Sample mailback website page does not show the ability to request more than one mailback package.	Language added to Mail-Back webpage (Appendix M).
<b>2204(b)</b> & <b>2205(b)(5)</b> : Does not describe how prepaid, preaddressed mailers will be distributed to persons providing services to disabled and home-bound residents.	Language added to Mail-Back webpage (Appendix M), and FAQ (Appendix N).
<b>2204(f)</b> & <b>2206(b)</b> : Proposed kiosk signage is not in the five required languages.	Translated signage is included in Appendix F.
<b>2204(g)</b> : Proposed goals should include a specific and measurable number for items discussed.	Updated goals in Section VII.
<b>2204(h)</b> : Outreach materials and signage can promote the consolidation of covered drugs and the recycling of drug packaging.	Recycling language added to the call script (Appendix L), website (Appendix M), and FAQ (Appendix N).
2206(a)(1): Outreach materials do not appropriately promote the collection options for covered drugs that the plan will provide.	Language promoting flushing of Unwanted Medicine when recommended by drug packaging has been removed from the Plan.
<b>2206(a)(3)</b> : The signage outlining what is accepted in the bins is not inclusive of all covered drugs.	Language updated in Section VI, Kiosk Signage (Appendix F), the call script (Appendix L), the website (Appendix M) and the Brochure and FAQ (Appendix N) to include Unwanted Medicine in any dosage forms, except for aerosols, inhalers, compressed cylinders, and injectable medicines contained within drug delivery mechanisms containing sharps.

MED-Project excluded pre-loaded products with a sharp and auto injectors from the Plan. MED-Project is requesting that it be given until October 14 to respond to the Department regarding these products. Additionally, if the "San Francisco Department of the Environment Regulation #SFE-16-01-

#### Attachment B

## San Francisco MED-Project

Medication Education & Disposal

San Francisco MED-Project LLC 1800 M Street, NW | Suite 400S | Washington, DC 20036 Phone: (202)495-3131 | Fax: (202)530-0659 ppswg@amsnavista.com

SDDSO: Proposed Regulations Implementing the Safe Drug Disposal Stewardship Ordinance" is effective before October 1, 2016 and requires any revision to the MED-Project Plan, MED-Project will also provide those Plan revisions on October 14, 2016.

Please feel free to contact me with any comments or questions regarding this letter or its attachments.

Sincerely yours,

Carrie Hoffman

Carrie Hoffman MED-Project

## Covanta GENERAL INFORMATION

### TYPE OF PERMIT(S) AND PERMIT NUMBERS?

		Title V	Wastewater	Storm Water
	Solid Waste Permit	Permit	Permit	Permit
Permit				
Number	FFP49-13	T097-32931-00123	495301	INRM01589
lssue Date	06/05/2013	09/19/2014	05/01/2015	11/4/2013
			,	
Expiration				
Date	06/04/2018	09/19/2019	04/30/2020	11/3/2018
				Indiana
Agency				Department of
Agency	Indiana Department of	Indiana Department of		Environmental
	Environmental Management	Environmental Management	Suez	Management
			http://www.mysu	http://www.in.gov
Website	http://www.in.gov/idem/	http://www.in.gov/idem/	ezwater.com/	/idem/
_				
Agency				
Contact	John Hale	Steve Dixon	Nancy Williams	Heather Schuler
Contact				
Phone				
Number	317-232-8871	317-232-8438	317-639-7047	317-233-1864

#### SAN FRANCISCO PUBLIC UTILITIES COMMISSION GENERAL MANAGER ORDER WASTE PHARMACEUTICALS DISPOSAL PROHIBITION

San Francisco Charter section 4.126 authorizes the General Manager to adopt rules and regulations governing matters within the jurisdiction of the SFPUC, subject to subsequent action by the Commission, if any, to modify the General Manager's exercise of such authority.

On January 23, 1992, the San Francisco Board of Supervisors adopted Article 4.1 of the Public Works Code. Article 4.1 sets discharge limitations and prohibitions for the discharge of waste to the sewer system, and authorizes the General Manager to adopt limitations.

Article 4.1 prohibits the discharge of harmful wastes into the sewer system, and authorizes the General Manager to adopt limitations imposing specific discharge requirements and to promulgate rules to accomplish the pollution prevention purposes of the Article.

The General Manager determines that adopting the following rule will further the purposes of Article 4.1 of the San Francisco Public Works Code and will protect human health and water quality:

Effective on and after March 1, 2016, no person shall discharge, deposit, throw, cause, allow or permit to be discharged, deposited or thrown into the City's sewerage system any pharmaceuticals, including prescription and non-prescription, except intravenous solutions containing only water and either sodium chloride, dextrose or electrolytes.

**RECOMMENDED:** 

**RECOMMENDED:** 

Tommy T. Moala Assistant General Manager, Wastewater Enterprise San Francisco Public Utilities Commission

Lewis Harrison Collections System Division, Wastewater Enterprise San Francisco Public Utilities Commission

**RECOMMENDED:** 

Halling for

Jər Harlan L. Kelly, Jr. General Manager San Francisco Public Utilities Commission

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