



**SF Environment**

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A Department of the City and County of San Francisco

London N. Breed  
Mayor

Deborah O. Raphael  
Director

## **Revised 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:** MED-Project, A Product Stewardship Plan for Unwanted Medicine from Households, City and County of San Francisco, dated November 1, 2018 as modified by MED-Project substantive change requests dated March 14, 2020 and July 15, 2020.

**PLAN OPERATOR:** San Francisco MED-Project, LLC  
Victoria Travis, National Program Director  
1800 M Street, NW, Suite 400 S  
Washington, DC 20036  
844-677-6532  
sanfrancisco@med-project.org

### **DETERMINATION:**

The following substantive **Changes #1 – #6** to MED-Project's Product Stewardship Plan for San Francisco dated November 1, 2018, as requested in letters dated March 14, 2020 and July 15, 2020, are **APPROVED** subject to revised **Conditions 1 through 13** below:

**Change #1:** The On-Demand Collection Service Model described in MED-Project's March 14, 2020 Substantive Change Request is approved as an addition to Section V.B.4 of MED-Project's November 1, 2018 approved Plan.

**Change #2:** The Vendors listed in Attachment A, Section X.A. of MED-Project's March 14, 2020 Substantive Change Request are approved for services related to collection, transport, or disposal of unwanted medicine from all forms of collection utilized by MED-Project.

**Change #3:** The Carriers and Transporters listed in Attachment A, Section X.B. of MED-Project's March 14, 2020 Substantive Change Request are approved for transportation of unwanted medicine from all forms of collection utilized by MED-Project.

Change #4: The Reverse Distributors listed in Attachment A, Section X.C of MED-Project's March 14, 2020 Substantive Change Request are approved for services related to collection, transport, or disposal of unwanted medicine from all forms of collection utilized by MED-Project..

Change #5: The following Disposal Facilities listed in Attachment A, Section X.D of MED-Project's March 14, 2020 Substantive Change Request are approved for disposal (destruction) of unwanted medicine from all forms of collection utilized by MED-Project:

- Clean Harbors Aragonite, LLC
- Heritage Thermal Services – Ohio
- Ross Incineration Services, Inc.
- Veolia – Port Arthur

Change #6: The Vendor, Transfer Facility, and Carriers/Transporters listed in Attachment A of MED-Project's July 15, 2020 Substantive Change Request are approved for services related to collection and disposal of Injector Mail-Back packages provided through the approved Plan of November 1, 2018.

**This Revised Notice of Determination does not address the following Disposal Facilities listed in Attachment A, Section X.D of MED-Project's March 14, 2020 Substantive Change Request.**

The Director has not, to date, received sufficient information from MED-Project to determine whether to approve these facilities for final disposal (destruction) of unwanted medicine from any form of collection utilized by MED-Project under the applicable subsections of Environment Code section 2207. Accordingly, the Department has issued a separate request for additional information from MED-Project dated July 28, 2020.

- Covanta – Marion, Oregon
- Curtis Bay Energy, LP
- Huntsville Solid Waste Disposal Authority
- Indianapolis Resource Recovery Facility (operating as Covanta – Indianapolis, IN)
- Lancaster County Waste to Energy Facility
- Stericycle – Warren, Ohio
- York County Resource Recovery Facility

**Following are the revised Conditions of Approval for MED-Project's Product Stewardship Plan for San Francisco, dated November 1, 2018 as modified by MED-Project's substantive change requests dated March 14, 2020 and July 15, 2020.**

1. The Producers represented by the MED-Project shall provide to the Department a complete list of all Producers participating in the MED-Project Stewardship Plan for San Francisco containing all information, including contact name and email, required in Section 2204(a) of the Ordinance upon request within 10 business days.

2. The Producers represented by the MED-Project shall submit digital photographs and the dimensions of mail-back packages to be distributed by Covanta Environmental Solutions at least 30 days in advance of MED-Project making them available to San Francisco residents.
3. Within 10 business days of each calendar quarter, the Producers represented by the MED-Project shall report in writing to the Department whether any new Pre-Filled Injector Products and/or Inhaler Products brought to market contain Schedule II to V Controlled Substances, and accordingly require handling by a DEA-registered reverse distributor.
4. Notification of non-substantive changes in Program Operation described in Section 2212(c) which are made at the discretion of MED-Project on behalf of the Producers they represent, including the closure of any of the standard mail-back envelope distribution points listed in Appendix C of the 11-1-2018 Revised Plan, shall be made in writing to the Department 15 days in advance of the change. Changes which occur due to location closure or withdrawal from the program shall be made in writing within 15 days of MED-Project's knowledge.
5. For each type and size of mail-back packages, the Producers represented by the MED-Project shall report the total of actual, not average, weights of mail-back packages received by the disposal vendor in future Annual Reports required in Section 2209 of the Ordinance.
6. Within 10 business days of the end of each calendar quarter, the Producers represented by MED-Project shall report, in writing to the Department a summary of Help Desk requests by type made in the previous quarter, including the number of each type, average days to close and the range (min/max days) in length of time to close.
7. The Producers represented by the MED-Project shall provide a minimum of 50 copies of the tri-fold flyer in Appendix O in English and 25 copies in each other language specified in the Ordinance on an annual basis by March 1 of each year and upon request to each of the San Francisco pharmacies, health-care facilities, veterinarians, and veterinary clinics on a list of these entities provided by the Department.
8. The Producers represented by the MED-Project shall report the numerical results of the Plan's Education & Public Outreach short term goals as described in Section VI (pg 18) of the November 1, 2018 approved Plan in each year's Annual Report.
9. Within 30 days of posting of a biennial survey on the MED-Project website, the Producers represented by the MED-Project shall submit a proposal to the Department to undertake additional outreach activities to raise public awareness of the MED-Project program if that residential biennial survey reports less than 50% public awareness based on the established survey compliance question.
10. Prior to implementing the On-Demand Collection Service Model, MED-Project shall submit to the Department an outline of the training to be provided to kiosk hosts using the new Service model. The

training shall include inspection of the kiosk for maintenance and cleanliness, procedures for requesting maintenance, and procedures to ensure that a packaged kiosk inner liner is removed from the collection site within established timeframes.

11. A Kiosk host who desires to utilize the On-Demand Collection Service Model shall provide written confirmation to the Department that their staff have received re-training in the procedures established for the On-Demand Collection Service Model, and identify the specific Federal Department of Transportation Special Permit they will be party to while utilizing the On-Demand Collection Service Model. Such written confirmation to the Department shall be provided at least 15 days before a change to the On-Demand Collection Service Model.

12. Within 10 business days of the end of each calendar quarter, the producers represented by the MED-Project shall report in writing to the Department the number of kiosk hosts who utilized the On-Demand Collection Service Model in the preceding quarter.

13. The Producers represented by the MED-Project shall submit an updated Stewardship Plan by October 25, 2022 and every four years thereafter.

The above Changes and Conditions of Approval shall be incorporated in the MED-Project Stewardship Plan per this Revised 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 accordance with applicable laws.

Signed: 

Date: 7/29/2020

Deborah O. Raphael  
Director  
San Francisco Department of the Environment