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A Department of the City and County of San Francisco

Edwin M. Lee  
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:** San Francisco MED-Project, A Product Stewardship Plan for Unwanted Medicine from Households, as revised July 14, 2016, and as modified by San Francisco MED-Project's Request dated October 19, 2016

**PLAN OPERATOR:** San Francisco MED-Project, LLC  
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cc: Carrie Hoffman, Plan Development Director

### **DETERMINATION:**

The San Francisco MED-Project (MED-Project) Product Stewardship Plan dated July 14, 2016, and as modified by MED-Project's Request dated October 19, 2016, is APPROVED subject to the following conditions:

1. Collection kiosks shall be installed and in operation by 90 days after agreements are signed by kiosk drop-off sites.
2. 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).
3. 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.
4. Call center operators shall respond to voicemail messages left through the interactive voice response system within one business day.

5. United Parcel Service (UPS) and Heritage Transport are approved as alternatives to the Transporters proposed and approved in Section XI(A) of the July 14, 2016, MED-Project Product Stewardship Plan.
6. Heritage Thermal Services (Ohio Facility) and Stericycle Inc. (Indianapolis Facility) as alternatives to the Disposal Facilities proposed and approved in Section XI(B) of the July 14, 2016, MED-Project Product Stewardship Plan.
7. The "common carrier" collection process described in the October 19, 2016, MED-Project Request is approved as an alternative to the "milk-run" collection process proposed and approved in Sections VI(B)(4), VI(B)(5), and VI(C)(2) of the July 14, 2016, MED-Project Product Stewardship Plan.
8. Any kiosk drop-off site that utilizes the "common carrier" collection process and stores packaged Unwanted Medicines inside their medicine collection kiosk shall have a UPS pickup within 1 business day of packaging to minimize the time the kiosk is inaccessible to the public.
9. Any pharmacy or Law Enforcement Agency (LEA) that is able and interested in serving as a kiosk drop-off site, but is not able or willing to store packaged Unwanted Medicines at their physical location, must be allowed to participate as a kiosk drop-off site.
10. MED-Project shall utilize the "milk-run" collection process proposed and approved in the July 14, 2016, MED-Project Product Stewardship Plan to service any collection kiosk site or LEA supervising a take-back event that is not able or willing to store packaged Unwanted Medicine at their physical location, or otherwise utilize the alternative "common carrier" collection process approved in Condition 9.
11. The approved Product Stewardship Plan shall meet all requirements of regulations adopted pursuant to Environment Code Chapter 22.
12. As of October 14, 2016, the Producers represented by the MED-Project have proposed, through their Plan Operator, a Supplemental Stewardship Plan for collection and disposal of the items below:
  - 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

The proposed Supplemental Stewardship Plan is under review by the Department pursuant to Environment Code Section 2211.

13. Within 60 days of approval of the Supplemental Stewardship Plan referenced in Condition 12, 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.

Failure to implement an approved Supplemental Stewardship Plan shall cause Producers to be out of compliance with the entire Stewardship Plan requirements of Environment Code Section 2203.

14. By July 25, 2017, the Producers represented by the MED-Project shall submit, through their Plan Operator, an updated Stewardship Plan that includes all approved modifications and alternatives 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 Environment Code Chapter 22.

15. This Notice of Determination supersedes the Notice of Determination issued on July 25, 2016.

The above conditions of approval shall be incorporated in the Product 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: Deborah O. Raphael Plan Approval Date: 12/16/2016

Deborah O. Raphael  
Director  
San Francisco Department of the Environment