CITY AND COUNTY OF SAN FRANCISCO
DEPARTMENT OF THE ENVIRONMENT
SAFE DRUG DISPOSAL

STEWARDSHIP
PLAN

PROPOSAL
MAY 22, 2020

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I. Introduction

Inmar submits this Safe Drug Disposal Stewardship Plan ("Plan") for Unwanted Covered Drugs in compliance with City and County of San Francisco Ordinance numbers 31-15 and 247-18 (collectively "the Ordinance") and Regulation #SFE-1-01-SDDSO, ("Regulation") for the management, collection, transportation, and disposal of Unwanted Covered Drugs from the residents of the City. All capitalized terms not otherwise defined shall have the same meaning as in the Ordinance and Regulation.

Inmar's Plan provides a comprehensive safe drug disposal stewardship program that includes compliant drug collection methods supported by outreach and education programs to increase resident awareness and participation. The Plan provides safe, secure, and convenient access on an ongoing basis for residents across the City and will be funded by participating covered manufacturers. The Plan also provides reporting on collection metrics and results of resident education and outreach campaigns.

II. Overview

Inmar's Plan is compliant with the Ordinance 31-15 and the Regulation. The Plan provides for safe, secure, and convenient access to Unwanted Covered Drugs drop-off sites on an ongoing basis for residents across the City and will be funded and paid for in accordance with § 2208. Inmar’s Plan also meets all requirements specified in Article 9.1 of Title 16 CCR Division 17 for Prescription Drug Take-Back Services. Inmar’s Plan will accept all Unwanted Covered Drugs regardless of who produced them and there will be no point-of-sale or point-of-collection fee charged to City residents.

As required under the Ordinance §2204, Inmar’s Plan includes the following components:

a) **Contact Information:** List and contact information for all current and/or potential drug producers participating in the Stewardship Plan;

b) **Collection System:** A description of the collection system to provide convenient ongoing collection service for all Unwanted Covered Drugs in accordance with the Ordinance §2205;

c) **Handling & Disposal:** A description of the handling and disposal systems to be used in accordance with the Ordinance §2205 and §2207;

d) **Policies and Procedures:** A description of the policies and procedures to be followed by Persons handling Unwanted Covered Drugs;

e) **Patient Privacy:** A description of how patient information on Drug packaging will be handled;

f) **Public Education & Promotion:** A description of Inmar’s public education outreach and promotion strategy required under the Ordinance §2206 and the Regulation §D, including a copy of standardized instructions for City residents, signage developed for Collectors, and required promotional materials;

g) **Goals:** A proposal as to Inmar’s short-term and long-term goals under the Plan in accordance with the Ordinance §2204(g)

h) **Miscellaneous:** Considerations for use of existing providers of waste pharmaceutical services, separating Covered Drugs from packaging where possible and recycling of Drug packaging where feasible.
As required in the Ordinance §2212(c), Inmar will notify the Director fifteen (15) days prior to making any changes to the Plan that do not substantively alter plan operations under subsection (a) of §2212.

III. Contact Information

a) Inmar Plan Liaison

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b) Producer(s)

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IV. Collection of Covered Drugs

✓ Ordinance § 2205

a) Convenient and Equitable Access

✓ Ordinance § 2205 (b)(1)

Pursuant to the Ordinance §2203 (4), Inmar will initiate operations within three (3) months after the Director’s approval of the Plan. Inmar will set up a collection system that provides convenient and equitable access to City residents as outlined in the Ordinance §2205. Collectors are searchable to residents in Google Maps, simply by typing “Drug Disposal,” or other similar phrases in the Google Maps applications.

Pursuant to §2205(b) (1), Inmar will establish a minimum of five drop-off sites in every Supervisorial District, geographically distributed to provide reasonably convenient and equitable access, giving preference to locating drop-off sites at retail pharmacies. It is Inmar’s intention to engage our existing pharmacy clients to become authorized collection sites. It is not our intention to duplicate kiosks that already exist in the City currently operated by other Plan Operators. Should volume demands indicate a need for additional kiosk capacity at location covered by Inmar or another Plan Operator, Inmar is willing to place additional kiosks adjacent to existing operating kiosks or supplement kiosk servicing frequency should the Department deem necessary. Inmar will work with other Plan Operators to coordinate kiosk locations and servicing needs to ensure safe and compliant kiosk operation. Where necessary, Inmar may engage long-term care facilities as potential authorized Collectors to ensure reasonably convenient and equitable access for all City residents. Appendix A includes a list of locations that would utilize a drop box as the collection method upon becoming a Collector.

Inmar is confident in our ability to meet the convenience standard provided in §2205(b) (1). To ensure the best possible access for City residents, Inmar also provides mail-back services in accordance with §2205(b) (5) and collection events. All types of collection methods are described in more detail below.
b) Collection Systems

- Ordinance §2205 (b) (2)-(4)
- Ordinance §2205 (d)

Pursuant to the Ordinance §2205 (b) (2), Inmar complies with DEA regulation 21 CFR Parts § 1317.60(c) and 1317.70(f), and seals all drop-box liners and mail-back envelopes. These liners and envelopes shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into a drop-box or mail-back envelope. Patient Privacy is addressed more specifically in Section VIII.

Pursuant to the Ordinance §2205(b)(3-4), Inmar will give preference to Retail Pharmacies and law enforcement agencies wherever possible to voluntarily serve as drop-off sites for Unwanted Covered Drugs. Inmar will work with all drop-off sites to validate that the requirements in §2205(d) including all relevant DEA and State of California Board of Pharmacy requirements are met.

Kiosk Specifications and Design

Inmar’s kiosk is made in the USA and designed to be safe and secure as required. Produced from 16-gauge cold-rolled steel, and with an easy-to-use, Americans with Disabilities Act (ADA)-compliant drop-box design, residents can easily drop unused medications through the drop door and into the shippable container and inner liner inside. The container is a 275 lb-rated box with a 6-mil, DEA-compliant liner. Liners are either 18 gallons or 35 gallons dependent upon geographical location and population density of the kiosk location. This volume rating is printed directly onto our 6-mil DEA-compliant liners and has passed the tests prescribed in accordance with ASTM D 1922 and ASTM D 1709.

The kiosk design itself exceeds standard security requirements. The top of the kiosk is sloped, limiting the ability to stack items on top. In addition, the drop-slot features an extended metal drop door that lowers into the container to detect when product capacity is reached. When the drop door encounters resistance within the kiosk, it is an indication that it is time to change the container. This manual capacity indicator eliminates the need to change batteries and/or sacrifice the location of the kiosk to be proximate to an electrical outlet. Lastly, the container access door is reversible to allow for convenient placement in any appropriate location in the pharmacy.

Per DEA requirements, the kiosk will be installed in the line of sight of pharmacy or DEA registrant employees and bolted to the floor or a permanent fixture. The Inmar kiosk has pre-drilled holes in the bottom for easier installation. It also features a 4-point locking system with steel projections in two center locations and the top and bottom of the door that are activated when locked for strengthened security. Top and bottom deadbolt locations are hidden from the outside to prevent break-ins.

The Inmar kiosk includes signage in English and Spanish and be available upon request in Chinese, Russian and Tagalog. Signage includes communication representing items allowed and prohibited for deposit into the kiosk. The signage will also feature a website and toll-free telephone number (detailed further in Section VII) so users of the program can ask questions and find more information. Inmar will work with the Department to design any additional signage that meets the needs and requirements of the program. See Appendix B for examples of existing signage.

Inmar’s kiosk is sent to the authorized collector along with enough supplies for 3 returns. Supplies include:
- Preaddressed, pre-paid serialized container
- Serialized inner liners to protect against puncture and provide a liquid barrier
• Easy-to-use zip ties to seal inner liner compliantly
• Absorbent pad for placement in the bottom of the inner liner bag

Kiosk design features

Drop slot with extended tongue to manually identify when container is nearing full

4-point locking system with hidden steel deadbolts that are activated when locked for strengthened security.

Optimal size for limited pharmacy footprint - measures 14.5” x 17.25”

Pre-drilled at the bottom for easier installation to securely bolt to floor.
Pick-Up and Disposal Coordination Options
For the safe on-site removal of contents and servicing of kiosks, Inmar abides by the DEA regulations in 21 CFR 1300 et al.

Inmar will work with each authorized Collector to develop a collection program schedule that works
specifically for their location - either an on-site or self-service option. Service technicians are available should emergency service be required. For a pickup request outside of the normal schedule, the standard response time is 48 hours.

Self-Service Returns
Inmar will also train authorized Collectors to service the kiosks on their own to allow for expedited servicing as desired. The steps to service a kiosk are fast, efficient, and DEA-compliant. Inmar will provide authorized Collectors with training materials including step-by-step instructions for tracking, sealing, shipping and replacing collection containers. See attached Steps to Start, FAQs, and Installation Instructions provided in Appendix B.

Technician-Assisted Returns
Inmar will provide contracted employees who will be trained specifically in servicing kiosks in a geographically-assigned area. These employees will establish a pattern for servicing the Collectors utilizing service metrics to establish an appropriate pattern of service. The service will include the following:

- Observation of the condition of the receptacle upon arrival
- Notification to the pharmacy employee of arrival
- Coordination of 2 pharmacy employees to witness change out of kiosk inner liner supplies
- Removal, packaging, and documentation of the inner liner and container from the kiosk
- Replenishment of new supplies for renewed operation
- General clean-up and wipe down of kiosk
- Notation of inner liner serial number removed, and replacement inner liner serial number installed along with signatures by 2 pharmacy employees (witnesses)
- Removal of full container to be placed behind the pharmacy counter to await FedEx pick up
- Final signature from pharmacy employees of completion of service.

The pharmacy employees need only to call FedEx to schedule pickup of the sealed liner.

Full-Service Returns
Inmar will offer on-site service for the collection, replacement, and shipping of full inner liner containers. This all-inclusive program removes the burden for the authorized Collector and the pharmacy employees. Inmar will initiate standard service intervals for each Collector. Once a pattern of usage has been established, the service schedule will be adjusted with the agreement of the authorized Collector to provide the best overall service with minimal interruption. Inmar will work with the Collector to adjust the schedule based on utilization of the receptacle.

Inmar will provide two employees with DEA regulation training to specifically service kiosks. The service will include the following:

- Observation of the condition of the kiosk upon arrival
- Notification to the pharmacy employees of arrival
- Removal, packaging, and documentation of the inner liner container from the kiosk
- Replenishment of new supplies for renewed operation
- General clean-up and wipe-down of receptacle
- Notation of the removed inner liner’s serial number and the replacement inner liner serial number installed along with signatures by 2 Inmar employees (witnesses)
- Removal of full container to be taken directly to FedEx by Inmar employees
- Final signature from pharmacy employee upon completion of service.
Auto-Replenishment of Kiosk Supplies

Regardless of service option selected, the supplies used to collect and transport Unwanted Covered Drugs are provided in automatically-replenished “kits” of three. Each kit includes: pre-labeled and pre-paid cardboard box containers, liquid barriers, and serialized, puncture-resistant inner liners. The kit mailers, when packaged with the interior components, are approximately 6 inches thick. The mailer is cinched tightly around the inner components, which makes for a very easy-to-store kit. Kits can be stored behind the pharmacy counter, behind a door, or under or behind a desk, with no ongoing maintenance required.

Upon receipt of the liner at our destruction partner’s site, an electronic raw data file via SSH File Transfer Protocol (SFTP) with the weight, serialized barcoded label information and tracking information is passed to Inmar. This information is then received and entered into our Order Management log and Inbound Receipts log. The system tracks when the second of the three inner liners is received at the destruction partner. Inmar then initiates a reorder trigger for the next kit to be shipped. Auto replenishment reduces the amount of inventory maintained at the Collector while maintaining sufficient supplies to keep the kiosk continuously operable.
c) Mail-Back Services

✓ Ordinance § 2205 (b)(5)

Pursuant to the Ordinance §2205(b) (5) Inmar will provide prepaid and preaddressed mailers to residents containing written instructions for returning Unwanted Covered Drugs. Mailers will be provided at approved drop-off sites and will also be available directly from Inmar via the program website and toll-free telephone number. As required, the website and toll-free number will be available in English, Spanish, Chinese, Russian, and Tagalog.

Mailers will be distributed at approved drop-off sites. Consumers will be able to locate the mail-back services nearest to them on Inmar’s LifeInCheck™ Consumer Drug Take-Back program website, https://rxdisposal.lifeincheck.com/.

Inmar will work with the Department, local law enforcement agencies, and local communities to determine the appropriate number of mail-back service sites and their specific locations.

Inmar is committed to providing all pharmacies an option to supply their customers with information regarding mailers. Inmar will provide pharmacies with small cards that can be handed out to City residents that may need access to this service. The card will instruct them to either call or visit the website to locate the nearest kiosk or request a mailer. Additionally, we will reach out to pharmacies filling prescriptions by mail to include the cards for the same options. A sample card is provided below:

Sample Business Card – Request Mail-Back Envelope

![Sample Business Card](Sample Business Card.png)

**Requesting Mailers**

City residents will be able to request mailers via Inmar’s LifeInCheck™ Consumer Drug Take-Back program website (https://rxdisposal.lifeincheck.com/) or the Inmar LifeInCheck™ Consumer Drug Take-Back toll-free phone line: 888-371-0717

Mailers will meet DEA requirements per DEA Rule § 1317.70(c):

- Preaddressed, postage paid
• Nondescript, and do not indicate what may be inside
• Waterproof, tamper-evident, tear-resistant, and sealable
• Contain a unique ID number that allows for tracking
• Include instructions for the user that indicate the process for mailing the package, substances that can be sent, notice that packages can only be mailed in the US customs territory, and notice that the only packages provided by the authorized collector will be accepted
• No personally-identifiable information will be required

A sample envelope is shown below:

Mail-Back Tracking

Mailers distributed by authorized mail-back distributors will be tracked in a method similar to the kiosk collection containers. Mailers will have a unique, serialized identification number. When mailers are distributed to residents requesting them, the authorized Collector employee will make note of this event on a serialization tracking sheet. Once the mailer arrives at the destruction facility, the serial number will be noted before final disposition.

Mailers distributed directly to residents via the website or via toll-free phone number requests will be tracked by Inmar when sent to residents and tracked at the destruction facility when they are returned.

This tracking process will allow Inmar to report the number of mailers distributed and returned in the Annual Reporting provided to the Department, as required.
Participating Collectors and Drop-off Sites

Inmar is actively in discussions with its existing pharmaceutical returns client network seeking pharmacies interested in becoming Authorized Collectors. Exhibit A represents a list of potential Participating Collectors and Drop-off sites pursuant to those discussions. Inmar is in the process of engaging these pharmacies to become authorized Collectors. Inmar will utilize hospitals with on-site pharmacies and law enforcement agencies as necessary to meet the goals of equitable and reasonably-convenient access for City residents. It is not Inmar’s intention to add additional Kiosks to locations with existing kiosks serviced by current Plan Operators. Should the Director determine that volume levels warrant additional Kiosks or additional Kiosks servicing frequency for Kiosks operated by other Operators, Inmar remains willing to provide either.

V. Outreach Program and Design

- Ordinance §2206
- Regulation (D)

a) Promotion

- Ordinance §2206 (a) (1)
- Regulation (D) (1.3)
- Regulation (D) (4.1)

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness of the Stewardship Plan and maximize participation pursuant to the Ordinance §2206 and Regulation (D). In addition to preventative education, Inmar’s strategy is designed to ensure that where and how to return Unwanted Covered Drugs is widely understood by City residents, pharmacists, retail pharmacies, health care facilities and providers, veterinarians, and veterinary hospitals.

Pursuant to the Ordinance §2206(a) (1) and Regulation (D) 1.3, the individual components of Inmar’s public outreach strategy are detailed below. Across all tactics, key messages will include, but not be limited to, the following:

- Promote safe storage of all drugs, wanted or wanted, by residents in their home;
- Discourage stockpiling and storage of Unwanted Covered Drugs in the home
- Describe where and how to return Unwanted Covered Drugs
- Discourage improper disposal of drugs (e.g., flushing or solid waste collection)
- Identification of locations and collection events in the City as part of National Consumer Drug Take-Back events.

If more than one Plan is approved by the department, at the direction of the Director and as the result of any meetings subject to the Regulation (4.1), Inmar will coordinate its promotional activities with other approved Plan Owner(s). Inmar will coordinate to ensure that residents clearly understand the logistics, safety and educational components of the Program. Inmar will coordinate educational outreach with other Plan Owners to ensure consistent messaging regarding the location of kiosks; safe disposal of medication; statistics regarding the dangers of pharmaceutical waste in the waste-stream, drug abuse statistics and other program advocacy; means of envelope distribution and any other pertinent information related to the success of the program. Inmar will coordinate with other Plan Owners to execute the Digital Media
outreach and Social Influencer outreach, while the other plan operator focuses on traditional print and television media. This coordination will include the fair and equitable division of resources. Additionally, Inmar will coordinate with other Plan Owners to ensure consistent messaging among the types of educational outreach. Inmar suggests the Program Operators form a trade association to ensure that there are no inefficiencies or distortions due to collaboration. A trade association protects against the types of illegal agreements that can distort competition.

**Outreach Materials**

Inmar provides easily-consumable educational materials for dissemination to interested parties including City residents, pharmacists, retailers, and health care practitioners upon request and at no charge.

These materials will:

- Provide instruction on how to safely store Covered Drugs at home
- Inform of the risks of disposing of Covered Drugs in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)
- Outline how to participate in the drug take-back program for safe disposal of Covered Drugs.

All materials will be easily understandable by interested parties with varying levels of English proficiency and will leverage explanatory graphics to aid in comprehension. Please see Appendix B for example materials.

In coordination with other Program Operators and the Director, Inmar will develop, or coordinate to develop a strategy for promoting the program through traditional media including local print, radio, and television with the goal of driving awareness and participation. The strategy will include a creative brief that outlines goals, target audience, messaging, and call to actions. Inmar will also provide a creative advertising template for print publications. To drive public relation impression, Inmar will develop press release templates and perform outreach to local media. Inmar will provide an example of a detailed traditional media plan upon request.

**b) Standardized Instructions**

- Ordinance §2206(a) (2)
- Regulation (D) (1.2)

Inmar provides Collectors with easy-to-understand and standardized instructions explaining how to use the collection kiosk. Training material provided to authorized Collectors include:

1. FAQs
2. Container Instructions
3. Steps to Start Document
4. Installation Reference Guide
5. Serialization Tracker

Training material samples are provided in Appendix B.

**Collection Kiosk Signage**

The collection kiosks themselves will be readily-recognizable. The standard color for the kiosk is bright
green for easy identification, and each kiosk is adorned with clear graphical instructions for proper use, which will be available in English, Spanish, Chinese, Russian, and Tagalog. Please see Appendix C for an image of the collection kiosk and disposal instructions.

c) Website and Toll-Free Number

Website
Inmar will provide a mobile-optimized website, appropriately translated into specified languages, which will publicize collection options and educate interested parties on proper disposal practices. Inmar will use enhanced search engine optimization to ensure easy location and access.

Specifically, the website will:

- Leverage Inmar’s collaboration with Google Maps to allow interested parties to find the nearest Collector or mail-back sites via an interactive map. The list of locations will be updated monthly to ensure accuracy and will include the locations of kiosks placed by Inmar and other Plan Operators.
- Allow interested parties to request prepaid return mailers
- Include educational and outreach materials promoting safe storage of drugs
- Feature links to LifeInCheck™ Consumer Drug Take-Back social media pages for more useful content.

Retailers or pharmacies interested in participating in the Stewardship Plan will be able to request more information through the website.

Please see Appendix D for images of the website interface and functionality.

Toll-Free Number
Inmar will operate a multi-lingual (English, Spanish, Chinese, Russian, Tagalog) toll-free call center that interested parties can call to learn more about the Stewardship Plan, collection events, and drug disposal best practices. City Residents will also be able to request information about the nearest collection site or mail-back site, or request that a prepaid mailer is sent to them. The call center is operated with live operators and will be staffed with a third party service to assist with live translation in the required languages. All operators are trained to assist answer questions related to any and all questions related to the Stewardship Plan operation including but not limited to Authorized Collector kiosk support and service requests.

Callers with medical emergencies will be directed to call 911. Patients with medication-related questions will be directed to contact their healthcare provider(s).

d) Survey and Outreach Effectiveness

Pursuant to the Ordinance §2206(a)(4), Inmar will conduct a biennial survey of City residents as well as pharmacists, veterinarians, and health professionals who interact with patients on use of
medicines after the first full year of operation of the Stewardship Plan. The aim of the survey questions will be to measure the percent awareness of the Stewardship Plan, 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 will be submitted to the Director for review and comment at least 30 days prior to the initiation of the survey. Results of the survey will be reported to the Director and made available to the public on the website required within 90 calendar days of the end of the survey period. The privacy of all survey respondents shall be maintained.

The initial biennial survey will be completed within four months of the completion of the first year of the collection program operation.

Impact Measurement
Pursuant to the Regulation (D)(3), Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.
Reporting will include:
- Third-party-verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

e) Additional Promotional Considerations

Collector Marketing Support
In collaboration with other Plan Operators and the Director, and to drive awareness and participation at a local level, Inmar will provide individual authorized Collectors with a variety of marketing assets, including in-store signage, social media content kits, press release templates, a radio ad script, and scripts for pharmacy staff to let City residents know that they can safely dispose of their Covered Drugs at that location. Authorized Collectors will be able to request additional marketing materials through the help desk.

Please see Appendix D for example materials.

Social Influencer Marketing
Inmar has a network of 12,000 influencers who are experts at creating content that can drive awareness and inspire participation among City residents. Inmar utilizes influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the City residents receiving the content are the ones most inclined to take action.
Content can focus on an array of topical themes, however, based on the Plan requirements, Inmar's recommendation would be one, or a combination of, the following:

- Tips for safe storage of drugs in the home prior to disposal
- Education about the implications of improper drug disposal
- Promotion of the Plan, including directions on where and how to participate

In partnership with Blue Cross Blue Shield of North Carolina and Mutual Drug pharmacies, fifteen local influencers wrote blog posts about their experience participating in the program. The posts encompassed topics such as why drug safety was important to them, where their followers could find a collection kiosk near them, and how drop-off worked. The campaign generated 11.4MM impressions, more importantly, the posts themselves were highly engaging. By amplifying the content using a range of highly-targeted ads in specific geographies we achieved an average click-through-rate (CTR) of 4.5% (a historical CTR benchmark in this category is 1.5 - 2.0%). Users spent an average of one minute and eight seconds on each post. Both metrics suggest users found the content compelling and useful. ROI for social influencer marketing campaigns is measured in terms of return on Total Media Value (the combined value of earned and paid media for the campaign). In this case, TMV return was favorable at 2.1x.

Please see Appendix D for sample social influencer content. We also invite you to view some of the top performing posts linked below:

- Life in Check Consumer Drug Take-Back receptacle | National Prescription Drug Take-Back Day by Meagan Harrell
- 5 Easy Tips to Declutter Your Closet + Safe Medication Disposal by Valerie Clement
- How to Dispose of Unused Medications Safely - Mom Always Knows by Elizabeth Hurt

**Targeted Media**

Inmar’s media team actively monitors social influencer content for the highest performers - focused on deeper measurements such as views and engagements. The most engaging content is promoted across social platforms as well as off-site media to amplify the message around drug take-back to a targeted cohort of interested parties.

Beyond social influencer content, Inmar will also post about the program twice monthly on our LifeInCheck™ Consumer Drug Take-Back social media channels and promote the posts with amplified media.

Inmar can leverage our partnership with PlaceIQ (an independent data and technology company that helps businesses leverage location-based insights to connect with and understand audiences) to deliver proximity-based SMART advertisements to consumers. SMART advertisements allow ad units to be delivered to County residents that are physically near selected locations (e.g., near a collection kiosk). More specifically, any device that routinely passes through a three-mile radius of a collection kiosk location can be served ads promoting the program on commonly used mobile apps like CNN, The Weather Channel, and even NFL Fantasy Football. With PlaceIQ’s addressable audience of 90MM households and 190MM devices across the US, content delivery can be easily scaled to drive program awareness and participation.
VI. Disposal of Covered Drugs

✓ Ordinance §2207

Inmar complies with all local, state, and federal laws and regulations applicable to disposal of pharmaceutical waste and controlled substances.

In accordance with Ordinance §2207(a) Inmar subcontracts with a trusted, permitted partner for hazardous waste disposal.

Kiosk containers will be sent from the authorized Collector directly to Clean Harbors for destruction as Inmar’s approved hazardous waste incinerator. Clean Harbors Aragonite, located in Grantsville, UT, will properly dispose of all collected containers. Clean Harbors Aragonite is a permitted hazardous waste incinerator that meets the requirements of 40 C.F.R. parts 60 and 62. Clean Harbors 5-year record of penalties, violations and/or regulatory orders is provided in Exhibit E.

FedEx is our transporter from the pharmacy to the Clean Harbors facility. Information on FedEx’s 5-year record of penalties, violations and/or regulatory orders received is detailed in its SEC filings found on [http://investors.fedex.com/financial-information/sec-filings/default.aspx](http://investors.fedex.com/financial-information/sec-filings/default.aspx)

Inmar’s DOT permit info:

- DOT Permit #: 050417 550 019Z
- DOT Special Permit #: 20255

<table>
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<th>Name</th>
<th>Address</th>
<th>DEA Registration</th>
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<tr>
<td>Clean Harbors Aragonite</td>
<td>11600 N. Aptus Rd. Dugway, UT 84029</td>
<td>RC0331049</td>
<td>RC0331049</td>
<td>DEA Reverse Distributor</td>
</tr>
<tr>
<td>Clean Harbors Aragonite</td>
<td>11600 N. Aptus Rd. Aragonite, UT 84029</td>
<td>UTD981552177</td>
<td>UTD981552177</td>
<td>Hazardous Waste Incinerator</td>
</tr>
</tbody>
</table>

See Exhibit E for copies of relevant permits, licenses.

VII. Policies and Procedures

Inmar operates collection kiosks across 46 States and the District of Columbia as part of its operations today and maintains compliance with all federal, state and local laws and regulations. Inmar will ensure that it acts in compliance with all applicable laws, rules, and regulations as specified by the Plan requirements and require, by contract, that vendors and Collectors are also compliant with all laws, regulations, and legal requirements.

Inmar, Collectors, and vendors will specifically be required to comply with The Controlled Substances Act, 21 USC SS 801-971 and 21 CFR SS 1317; United States Department of Transportation Hazardous
Materials Regulation, 49 CFR parts 100-185; California Board of Pharmacy and all applicable City and County of San Francisco Ordinances and Regulations.

The DEA allows law enforcement agencies, retail pharmacies, reverse distributors, hospitals or clinics with onsite pharmacies, and certain other entities to be registered with DEA as an authorized Collector.

Inmar has established standard operating procedures that require Collectors to adhere to these standards. Any Collector agreements specifically require their compliance ensuring their commitment to compliant operation of the collection kiosk and shipping of contents in compliance with the DEA regulations. A refusal to sign the agreement or comply with the DEA regulations would be a reason why a Collector would be excluded from the Stewardship Plan.

Documentation and Tracking
Collection containers and inner liners will have a serialized identification number to enable tracking at all stages of the return process illustrated below.

Tracking is well-documented as evidenced by the Inmar serialization tracking form that is included in full as Appendix C and referenced below. This form must be completed and witnessed by two authorized Collector employees, which assures compliance and safety across the program, and internally by both the stewardship organization and the Collector.

![Drug Disposal Serialization Tracking Sheet Inner Liner Tracking Form](image)

The purpose of this form is to document the use of the serialized inner liner throughout the collection process and to help the authorized collector meet DEA and Board of Pharmacy record-keeping requirements.
requirements. Inmar will require each authorized collector to understand and comply with all Federal, State, and local regulatory requirements pertaining to Unwanted Covered Drugs applicable at the authorized Collection Point.

The serial numbers, date acquired, and signature of one authorized pharmacy employee must be completed upon receipt of the container and inner liner. As illustrated above, the date installed is to be completed by two authorized pharmacy employees with their names and signatures. The date the container and inner liner are removed from the kiosks is also to be noted with names and signatures. Finally, the date the container and inner liner are shipped is noted with authorized names and signatures.

Authorized collectors must maintain a copy of the completed form, a copy of the FedEx tracking information, and other records as applicable, on file at the Collector’s registered location for at least two years.

**Transport**
The Collector will properly seal, store securely, and arrange for pickup of the container from the registered location in a manner consistent with DEA regulations. The container will include a preaddressed and prepaid shipping label. The FedEx representative will take possession of the container and deliver it to Clean Harbors for witnessed incineration.

**Disposal**
Once the container arrives at the destruction facility, the serial number will be noted before final disposition, which allows Inmar to report the number of containers distributed and returned in the reporting provided to the City, as required.

**Compliance with Applicable Laws**
Inmar operates across 46 states and the District of Columbia and maintains compliance with all applicable federal, state, and local laws. Upon approval to act as an operator, Inmar, its vendors and Collectors will comply with the program requirements.

Inmar’s training materials, found in Appendix B, aid Collector in proper kiosk installation, which helps optimize the security of the unit. The training materials also include information on kiosk operation, inner container materials assembly and placement, regulated shipping instructions, program FAQs, and serialization tracking.

**VIII. Patient Privacy**
Inmar provides significant training to our participating authorized collectors and strictly follows the DEA guidelines for the proper handling of the Plan kiosks and inner liners. This begins with the proper training of the authorized collector in the compliant operation of the kiosks and proper preparation, removal, and packaging of the container. It also involves the training of the Inmar staff that may come into contact with the full container to ensure proper handling. Inmar strictly complies with State and Federal statutes and regulations including, but not limited to, the DEA guidelines cited below.
According to the DEA - As provided in §§ 1317.60(c) and 1317.70(f), inner liners shall be sealed immediately upon removal from the permanent outer container; sealed inner liners and returned mail-back containers shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into kiosks or mail-back containers. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into collection kiosks.

Inmar has a long history of serving both commercial and government clients with stringent program requirements. For example, Inmar’s pharmacy applications manage Protected Healthcare Information (PHI) and are HIPAA compliant. Additionally, as part of Inmar’s Rx Returns (reverse distribution) business, we work very closely with regulators to implement compliant procedures covering the DEA, Boards of Pharmacy, EPA, and other tangential regulatory entities. Data protection, privacy, and adherence to applicable regulations are the foundation of Inmar service capabilities.

Any and all patient information on drug packaging will be promptly destroyed.

IX. Reporting

Ordinance §2209

Within six months after the end of the first 12-month period of operation, and annually thereafter, Inmar will submit a report describing the program’s activities during the previous reporting period. The report will include:

1. A list of participating Producers
2. The amount by weight of Covered Drugs collected, including the amount by weight from each collection method used
3. A list of drop-off sites
4. The number of mailers provided for disabled and/or home-bound City residents
5. The locations where mailers were provided, as applicable
6. The dates and locations of collection events held, as applicable
7. The transporters used and the disposal facility or facilities used for all covered drugs
8. Whether any safety or security problems occurred during collection, transportation or disposal of unwanted covered drugs during the reporting period and, if so, what changes have or will be made to policies, procedures or tracking mechanisms to alleviate the problem and to improve safety and security in the future
9. A description of the public education, outreach and evaluation activities implemented during the reporting period
10. A description of how collected packaging was recycled to the extent feasible, including the recycling facility or facilities used
11. A summary of the Stewardship Plan’s goals, the degree of success in meeting those goals in the past year, and, if any goals have not been met, what effort will be made to achieve the goals in the next year
12. The total expenditures of the Stewardship Plan during the reporting period.
X. Goals

Program Collection Goals

<table>
<thead>
<tr>
<th></th>
<th>6 Months</th>
<th>12 Months</th>
</tr>
</thead>
</table>
| • Initiate program operation | Inmar’s goal is to exceed the minimum of 25 kiosks placed across the City to provide equitable and reasonably convenient access to residents. If this goal cannot be met, underserved areas will be targeted for mail-back sites or collection events. | • Establish mail-back sites and/or collection events in areas that are underserved by collection drop-off sites  
• Provide and communicate system for pharmacies to request mailers. |
| • Increase authorized Collector drop-off sites in the City |                                                                                                                                                                                                           |                                                                                                                                                                                                          |

Program Promotion Goals

<table>
<thead>
<tr>
<th></th>
<th>Complete</th>
<th>6 Months</th>
<th>12 Months</th>
<th>18 Months</th>
</tr>
</thead>
</table>
| • Website launch | Website functionality updates:  
 o Mailer requests  
 o Educational materials uploaded  
 o Authorized Collector kiosk maintenance resources and requests  
 o Collector and mail-back site list updated (ongoing)  
• Initiate social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) | Website functionality updates  
 o Translation into specified languages  
 o Collector and mail-back site list updated (ongoing)  
• Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) | Website functionality updates  
 o Collection site and return envelope Collector and mail-back site list updated (ongoing)  
• Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month) |
| • Interested party educational materials |                                                                                                                                                                                                           |                                                                                                                                                                                                          |
| • Authorized Collector marketing support materials |                                                                                                                                                                                                           |                                                                                                                                                                                                          |
XI. Additional Plan Considerations

Existing Stewardship Organizations
To the extent that existing Stewardship Organizations are already in operation, Inmar will determine if coordinating efforts creates efficiencies for the City and improves convenient and equitable access for City residents.

Furthermore, to the extent that there are other Stewardship Organizations, Inmar will seek to coordinate its activities with said programs within 12 months at the direction of the Director before or after Inmar’s Stewardship Plan is approved. Inmar’s LifInCheck™ Consumer Drug Take-Back website will ensure that all City residents can easily identify, understand, and access the collection services provided by Inmar and other Stewardship Organizations. Coordination efforts will include providing a single website and toll-free telephone number to access information including consolidated kiosk locations for all approved Plans. Inmar suggests the Program Operators form a trade association to ensure that there are no inefficiencies or distortions due to collaboration. A trade association protects against the types of illegal agreements that can distort competition.

Package Separation & Recycling
DEA § 317.75(c) prohibits handling substances after they have been deposited into a collection kiosk. For this reason, Inmar is unable to separate and recycle drug packaging. Inmar can, however, execute educational programs, as outlined in Section VI, to encourage City residents to separate Unwanted Covered Drugs from their packaging and recycle the packaging prior to disposal.

Even though regulations prevent us from recycling drug packaging, Inmar has an interest in reducing waste and improving our environment. Through our Rx Returns and related business lines, Inmar has saved over 20,000 barrels of oil, recovered over 11,000 megawatts of clean energy, and powered over 900 homes in the past two years alone. We will continue to look for opportunities to expand our eco-friendly efforts in the City.
Appendix

A. Potential Collector Location Sites 25

B. Training Material 27

C. Kiosk Signage 50

D. Promotion Material 52

E. Applicable Permits and Licenses 59
## Appendix A: Potential Collector Location Sites

<table>
<thead>
<tr>
<th>Store Name</th>
<th>Store Address</th>
<th>Store Zip</th>
<th>County</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>SAFEWAY PHARMACY #1711</td>
<td>15 MARINA BLVD</td>
<td>94123</td>
<td>San Francisco</td>
<td>Agreed</td>
</tr>
<tr>
<td>SAFEWAY PHARMACY #1507</td>
<td>2020 MARKET STREET</td>
<td>94114</td>
<td>San Francisco</td>
<td>Agreed</td>
</tr>
<tr>
<td>SAFEWAY PHARMACY #2606</td>
<td>298 KING STREET</td>
<td>94107</td>
<td>San Francisco</td>
<td>Agreed</td>
</tr>
<tr>
<td>SAFEWAY PHARMACY #2646</td>
<td>735 7TH AVENUE</td>
<td>94118</td>
<td>San Francisco</td>
<td>Agreed</td>
</tr>
<tr>
<td>VISITACION VALLEY PHARMACY</td>
<td>100 LELAND AVE</td>
<td>94134</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>SAN FRANCISCO GEN. HOSP.</td>
<td>1001 POTRERO AVE</td>
<td>94110</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>ADDICTION RESEARCH &amp; TREATMNT</td>
<td>1111 MARKET ST 1ST FL</td>
<td>94103</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>SAFEWAY PHARMACY #0995</td>
<td>1335 WEBSTER STREET</td>
<td>94115</td>
<td>San Francisco</td>
<td>In Discussion</td>
</tr>
<tr>
<td>DMSF PHARMACY SERVICES</td>
<td>1380 HOWARD STREET</td>
<td>94103</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>SAFEWAY PHARMACY #1711</td>
<td>15 MARINA BLVD</td>
<td>94123</td>
<td>San Francisco</td>
<td>In Discussion</td>
</tr>
<tr>
<td>UCSF MEDICAL CENTER MISSION BAY</td>
<td>1500 OWENS ST STE 460</td>
<td>94158</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>FRANKLIN PHARMACY</td>
<td>1508 FRANKLIN ST</td>
<td>94109</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>STUDENT HLTH SERVICE PHARMACY</td>
<td>1600 HOLLOWAY AVE</td>
<td>94132</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>BAYVIEW HUNTERS POINT METHAD</td>
<td>1625 CARROLL AVE</td>
<td>94124</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>B &amp; B PHARMACY</td>
<td>1727 A FILLMORE STREET</td>
<td>94115</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>UCSF MEDICAL CENTER BENIOFF</td>
<td>1975 4TH ST. ROOM #C4411</td>
<td>94158</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>KAISER SAN FRANCISCO HOSPITAL</td>
<td>2130 O’FARRELL ST</td>
<td>94115</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>KAISER HEALTH PLAN PHARMACY</td>
<td>2238 GEARY BLVD</td>
<td>94115</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>KAISER FOUNDATION HEALTH</td>
<td>2238 GEARY BLVD. 1ST FLOOR</td>
<td>94115</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>SUTTER PROFESSIONAL PHARMACY</td>
<td>2300 SUTTER STREET #101</td>
<td>94115</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>PAMF SAN FRANCISCO WALK IN CLINIC</td>
<td>240 KING STREET, SUITE G2</td>
<td>94107</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>KOSHLAND PHARM: CUSTOM COMPOUNDING PHARM</td>
<td>301 FOLSOM ST.</td>
<td>94105</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>JEWISH HOME FOR THE AGED PHARMACY</td>
<td>302 SILVER AVENUE</td>
<td>94112</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>UCSF SCHOOL OF PHCY</td>
<td>3333 CALIFORNIA STREET</td>
<td>94118</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>Pharmacy Name</td>
<td>Address</td>
<td>Zip</td>
<td>City</td>
<td>Status</td>
</tr>
<tr>
<td>---------------------------------------------------</td>
<td>----------------------------------</td>
<td>-----</td>
<td>------------</td>
<td>------------</td>
</tr>
<tr>
<td>CPMC MISSION BERNAL CAMPUS PHARMACY</td>
<td>3555 CESAR CHAVEZ</td>
<td>94110</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>CA PACIFIC MED CTR PHY-CA WEST CAMPUS</td>
<td>3700 CALIFORNIA ST</td>
<td>94118</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>UNIV OF CALIFORNIA SAN FRAN</td>
<td>401 PARNASSUS AVE</td>
<td>94143</td>
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<td>Notified</td>
</tr>
<tr>
<td>AIDS HEALTHCARE FOUNDATION</td>
<td>4071 18TH STREET</td>
<td>94114</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>KAISER FOUNDATION HOSPITAL</td>
<td>4131 GEARY BLVD</td>
<td>94118</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>ADDICTION RESEARCH &amp; TREATMENT</td>
<td>433 TURK ST</td>
<td>94102</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>ST. MARY'S MEDICAL CENTER</td>
<td>450 STANYAN ST</td>
<td>94117</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>KENTFIELD HOSPITAL SAN FRANCISCO</td>
<td>450 STANYAN ST FL 6</td>
<td>94117</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>FOUR FIFTY SUTTER PHARMACY</td>
<td>450 SUTTER STREET #710</td>
<td>94108</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>BAYER HEALTHCARE, LLC</td>
<td>455 MISSION BAY BLVD (SOUTH)</td>
<td>94158</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>CALIFORNIA PACIFIC MEDICAL, -</td>
<td>475 BRANNAN STREET</td>
<td>94107</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>WELLMAN'S PHARMACY</td>
<td>728 PACIFIC AVE #110</td>
<td>94133</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>CHINESE HOSPITAL PHARMACY</td>
<td>845 JACKSON ST ROOM 1102</td>
<td>94133</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>CHINESE HOSPITAL ASSN INC</td>
<td>845 JACKSON STREET</td>
<td>94133</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>ST FRANCIS MEMORIAL HOSP</td>
<td>900 HYDE STREET</td>
<td>94109</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>CA PACIFIC MED CTR PHY-DAVIES CAMPUS</td>
<td>CASTRO AND DUBOCE STREETS</td>
<td>94114</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>LUCKY PHARMACY #755</td>
<td>1515 SLOAT BLVD</td>
<td>94132</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
<tr>
<td>LUCKY PHARMACY #756</td>
<td>1750 FULTON ST</td>
<td>94117</td>
<td>San Francisco</td>
<td>Notified</td>
</tr>
</tbody>
</table>
Appendix B: Training Material

Training material provided to authorized Collectors include:

1. FAQs
2. Container Instructions
3. Steps to Start Document
4. Installation Reference Guide
5. Serialization Tracker

All of the aforementioned documents are provided on the following pages.
FAQS FOR CONSUMER DRUG TAKE-BACK

CONSUMER DRUG TAKE-BACK
CLIENT SERVICE TEAM

take-back@inmar.com
(800) 350-0396 Option 6
Mon-Fri 8am - 5pm EST

© Inmar 2020. Inmar authorizes the posting of the plan dated May 22, 2020 in accordance with Section 2211(b) and 2211(g) of the San Francisco Ordinance 31-15 for Safe Drug Disposal Stewardship for the purposes of making it available to the public for review and comments. Any other use requires express written consent of Inmar.
WHAT TO EXPECT AS A NEW INMAR CONSUMER DRUG TAKE-BACK PROGRAM CLIENT

1. You will receive a “welcome” email from take-back@inmar.com. This email will include “Steps to Start,” a Consumer Drug Take-Back Serialization Tracking Sheet and Receptacle Installation Instructions.

2. You will receive your CDTB receptacle and the collection container supplies via separate shipments within 5-7 business days after returning the Agreement. The collection container supplies should allow you to operate your program for three months.

3. Be sure to install your receptacle in strict accordance with instructions provided to help ensure you remain compliant with the Secure and Responsible Drug Disposal Act.

4. Prepare and install the collection container according to instructions provided. Track the serialized inner liner from receipt to return on the Serialization Tracking Sheet.

5. Return collection container to Inmar. When we receive your second returned container, we will send you another three-month supply of collection containers, liners and zip ties.

FREQUENTLY ASKED QUESTIONS

Note: Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

Consumer Drug Take-Back Client Service Team ● Take-Back@inmar.com
(800) 350-0396 Option 6 ● Mon - Fri 8am-5pm EST
## Installation / Removal

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> How is the receptacle installed?</td>
<td>The receptacle must be affixed to a wall or bolted to the floor for compliance with the Responsible Disposal Act. Inmar provides a printed guide for easy installation.</td>
</tr>
<tr>
<td><strong>2</strong> Where are the keys located for the receptacle?</td>
<td>The keys are located in the top bin of the receptacle. Please note there are two sets of keys provided for each lock. We suggest these duplicates be immediately separated and each set stored in a safe place.</td>
</tr>
<tr>
<td><strong>3</strong> If I need replacement keys, where is the lock number located?</td>
<td>Each lock has a lock number printed on the outside of the lock. When ordering replacement keys, you will need to reference the receptacle PC number which is located on the inside left of the drop-door.</td>
</tr>
<tr>
<td><strong>4</strong> When should I ship the collection container to Inmar?</td>
<td>Full containers should be shipped immediately after the inner liner is sealed and packaged for shipping. The container is sent to you already prepared with a prepaid FedEx shipping label.</td>
</tr>
<tr>
<td><strong>5</strong> How will I know when the collection container is full?</td>
<td>The drop-door has an extended tongue that lowers down into the container when the drop-door is closed. When the product builds to a certain height, the door will have some resistance in operation. This will indicate it is time to change the container.</td>
</tr>
<tr>
<td><strong>6</strong> Where is the serial number located?</td>
<td>The inner liner is serialized and the outside of the cardboard shipping container is serialized. These serial numbers match and are packaged as a kit. Therefore, it is critical that the pieces of the kit stay together throughout usage and return shipping.</td>
</tr>
</tbody>
</table>

### Installation / Removal Continued

**Note:** Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

**Consumer Drug Take-Back Client Service Team**  ●  [Take-Back@inmar.com](mailto:Take-Back@inmar.com)

(800) 350-0396 Option 6  ●  Mon - Fri 8am-5pm EST
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>7</strong> Do I need to wait until the shipping company is on-site for pickup before I change the container?</td>
<td>As the pickup is standard FedEx, most of our customers change the container and then call FedEx. Please be aware that the DEA requires that the sealed container be held in the controlled substances area during the time between liner removal and pickup.</td>
</tr>
<tr>
<td><strong>8</strong> When ordering multiple receptacles, is it required that each receptacle be shipped to the location where they will be installed or can they be shipped to a central location and then transported?</td>
<td>The metal receptacles can be shipped to whatever location you choose. The supplies are shipped separately from our facility in Fort Worth, TX. It will be important to notify your staff to be on the lookout for these supplies so they are not inadvertently discarded.</td>
</tr>
<tr>
<td><strong>9</strong> How do I order more collection containers?</td>
<td>Upon receipt of your second returned container, Inmar will automatically send you a supply kit for your next three returns. If you need additional supplies, please contact Inmar via the email address or phone number listed below.</td>
</tr>
</tbody>
</table>

**Compliance / Regulatory**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>10</strong> Is there a statement from the DEA allowing for video monitoring of the receptacle?</td>
<td>There is no statement allowing video surveillance. However, the regulations state that regular monitoring by employees is required. This is the exact text from the Regulation Part 1317 Subpart B (1317.75 2(i)): &quot;(i) At a hospital/clinic: A collection receptacle shall be located in an area regularly monitored by employees, and shall not be located in the proximity of any area where emergency or urgent care is provided.” VIDEO MONITORING IS NOT ALLOWED IN CALIFORNIA (not part of DEA regulation).</td>
</tr>
<tr>
<td><strong>11</strong> Are the items collected considered medical waste?</td>
<td>Household pharmaceuticals collected by take-back programs are not considered medical waste and, therefore, not subject to EPA RCRA rules. The items collected are considered household waste as long as the take-back program rules are followed. That is, no sharps, non-pharmaceuticals, etc. allowed in the receptacles.</td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
</tr>
<tr>
<td>----------</td>
<td>--------</td>
</tr>
<tr>
<td><strong>What should the pharmacist do if they see someone put a “not allowed” substance or item in the receptacle?</strong></td>
<td>Those responsible for monitoring the receptacle should do their best to keep this from occurring. However, the DEA specifies opening the inner liner is not allowed.</td>
</tr>
<tr>
<td><strong>Can non-controlled medications and controlled substances be placed in the LifeInCheck Consumer Drug Take-Back receptacle?</strong></td>
<td>Yes. Comingling of controlled and non-controlled substances is allowed in the take-back receptacle.</td>
</tr>
<tr>
<td><strong>If a patient asks the pharmacist to place their medications in the receptacle, can they do so?</strong></td>
<td>With an exception for personnel in a long term care facility, the drug owner or a member of his/her household are the only persons allowed to place items in the take-back receptacle.</td>
</tr>
<tr>
<td><strong>Where can I find information on DEA regulations?</strong></td>
<td>You can access links for DEA registrants, LTCFs and more here: <a href="https://www.deadiversion.usdoj.gov/drug_disposal/index.html">https://www.deadiversion.usdoj.gov/drug_disposal/index.html</a>.</td>
</tr>
<tr>
<td><strong>Are there any regulations limiting the number of keys I can replicate for these units?</strong></td>
<td>The DEA does not specify anything regarding the keys, only that the receptacle is secure, monitored and that two staff members are present when it is opened.</td>
</tr>
</tbody>
</table>

**Marketing / Promotion**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Can the pharmacy add a logo to, or brand, the receptacle?</strong></td>
<td>The magnet provided by Inmar must be placed on the front door of the receptacle. The sides can be used for your logo/brand. If the full-price subscription was purchased, then the pharmacy can place a logo/brand on the sides or front.</td>
</tr>
<tr>
<td><strong>Are there marketing materials available to help me promote my take-back program?</strong></td>
<td>Please contact Inmar for the latest marketing materials. These include signage, social media copy and images as well as language for press releases and ads.</td>
</tr>
</tbody>
</table>

**Note:** Two pharmacy personnel are required to install, remove, store and transfer the corrugate collection container.

*Consumer Drug Take-Back Client Service Team ● Take-Back@inmar.com*(800) 350-0396 Option 6 ● Mon - Fri 8am-5pm EST
KIT CONTENTS

Each shipment contains 3 individually packaged kits with unique components to each kit. **DO NOT** rearrange contents between kits.

THE KIT:

1. The kit will arrive in a package similar to this.

2. The kit will include three numbered and pre-labeled boxes.

Each kit contains one of each of the following items:

1. Zip tie
2. Absorption pad
3. Inner liner
4. Numbered and pre-labeled box

IMPORTANT:

For every shipment – serial number on inner liner & serial number on cardboard container **MUST MATCH**.
NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back Container should be performed by two pharmacy personnel.

KIT INSTRUCTIONS–
INSTALLING A NEW COLLECTION CONTAINER

1. Document the serial number and receipt of each inner liner on the Drug Disposal Serialization Tracking Sheet.

2. Close and tape the box bottom. Seal the middle seam and both outside seams. Leave no un-taped spaces along the seams. We recommend 1 strip of tape across the bottom seam, 2 strips of tape over the edge seams and 2 strips of tape across the bottom of the container placed diagonally. See illustration to right.

3. Place inner liner into the box and fold excess material at top over box flaps.
KIT INSTRUCTIONS—
INSTALLING A NEW COLLECTION CONTAINER

4 Tape the zip tie to the inside of the door for later use.

5 Place absorbent pad into the installed inner liner.

6 Install the lined box (now the “Container”) into the Collection Kiosk.
KIT INSTRUCTIONS—
INSTALLING A NEW COLLECTION CONTAINER

7  Immediately document installation of Container on the Drug Disposal Serialization Tracking Sheet.

8  Lock the bottom door and unlock the drop door at the top of the receptacle to begin drug disposal collection.

9  Store remaining spare kits securely for future use.

10 Use the Drug Disposal Serialization Tracking Sheet to document all inner liner events.
NOTE: All direct contact with the LifeInCheck Consumer Drug Take-Back Container should be performed by two pharmacy personnel.

KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

Note: The total weight of the Container ready for shipping may not exceed 66 pounds.

1 Unlock and open bottom door.

2 Remove full Container from Collection Kiosk. DO NOT sort, count or inventory pharmaceuticals or touch contents of inner liner prior to sealing.
KIT INSTRUCTIONS – REMOVING AND SEALING A FULL COLLECTION CONTAINER

3. Immediately seal the Inner Liner by gathering the top of the Liner.

4. Bend the gathered portion at the halfway point and fold the top half alongside the bottom half.

5. Repeat Step 4 - Again bend the gathered portion at the halfway point and fold the top half alongside the bottom half.
6 Cinch and fully tighten the provided zip tie around both halves of the gathered portion of the liner to secure the top.

7 Close and tape the box top. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams. We recommend 1 strip of tape across the top seam, 2 strips of tape over the edge seams, and 2 strips of tape across the top of the Container placed diagonally. See illustration to right.
KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER


PLEASE NOTE:

Your cardboard container is pre-labeled for shipping. This label is pre-paid with FedEx and must not be copied.

Additional charges may apply for non-compliance.

Questions: Contact Consumer Drug Take-Back Client Service Team
take-back@inmar.com
1–800–350–0396 Option 6, Mon–Fri 8am-5pm EST
RECEPTACLE
You will receive your Consumer Drug Take-Back receptacle and your supplies in separate shipments. After unpacking the Consumer Drug Take-Back receptacle, it must be installed according to the “Responsible Disposal Act” Rule which means it must be connected to a wall or the floor ensuring the receptacle is secure. Your receptacle will come pre-drilled in the bottom to make installation easier. Please see the installation instructions included in this email.

Your usage of the Inmar Consumer Drug Take-Back Program indicates your agreement to accept responsibility for following the Federal Guidelines. DEA’s Final Rule, which implements the Secure and Responsible Drug Disposal Act of 2010 (“the Disposal Act”).

SUPPLIES
After completing the proper installation of your Consumer Drug Take-Back receptacle, you should unpack your supplies.

Included are supplies to operate your Consumer Drug Take-Back program for 3 shipments. Upon Inmar’s receipt of your second container (return) shipment, we will automatically send your next 3 shipment supply package so you will always have the necessary supplies on hand. Staged shipping of your supplies alleviates your need to store large supply quantities.

Each shipment contains 3 individually-packaged kits with unique components to each kit. DO NOT rearrange contents between kits.

Each kit contains one of each of the following:

- Serialized Inner Liner
- Absorption pad
- Serialization Tracking Sheet (emailed separately)
- Black Zip Tie
- Set of instructions (Single Page)
- Numbered and pre-labeled cardboard box

It is important for you to document receipt of the serialized Inner Liners on your tracking form. To assist, Inmar has provided the Serialization Tracking sheet (Inner Liner Tracking Form). Maintain a copy of the completed Serialization Tracking Sheet in your files for at least 2 years (at the collector’s registered location). Refer to 21 CFR § 1304.04(a).

CONSTRUCTING YOUR INNER CONTAINER
Construct 1 cardboard container applying an appropriate amount of tape to the bottom to ensure safe transportation. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams and no less than 3 inches of tape overhang on each side. We recommend 2 strips of tape across the bottom seam and 2 strips of tape over the edge seams and 2 strips of tape across the bottom of the container placed diagonally. See illustration to right.

NOTE: All direct contact with the unsealed Consumer Drug Take-Back liner must be performed by two pharmacy personnel.
PREPARING YOUR CONTAINER FOR USAGE

1. Place Serialized Inner Liner into the box and fold excess material at top over box flaps. Leave Black Zip Tie taped to the Liner for later use. (When inserting Inner Liner, check to ensure Serial Number on Serialized Inner Liner matches Serial Number on the shipping container.)

2. Place absorbent pad into the installed Liner.

3. Install the lined box (now the “Container”) into the Collection Receptacle.

4. Immediately document installation of Container (column 3 of the Serialization Tracking Sheet).

5. Store remaining spare kits securely for future use.

6. Lock bottom door and unlock top door to begin CDTB collection.

PREPARING YOUR CONTAINER FOR SHIPPING

**Note:** The total weight of the Container ready for shipping MAY NOT EXCEED 66 POUNDS IN WEIGHT.

1. Unlock and open bottom door.

2. Remove full Container from Collection Receptacle. DO NOT sort, count or inventory pharmaceuticals or touch contents of Liner prior to sealing.

3. Immediately seal the Serialized Inner Liner by gathering the top of the Liner, bending the gathered portion at the halfway point and folding the top half alongside the bottom half. For extra security, bend the gathered portion at the halfway point a 2nd time. While folding Liner, keep Serial Number on Liner visible. Securely cinch the provided Black Zip Tie around both halves of the gathered portion of the Liner to secure the top. Ensure that the zip tie is completely above the exposed end of the top half of the gathered portion and that the zip tie is fully tightened. This will provide an airtight seal at the open end of the Liner to prevent leakage of any trace liquids that may be inside.

4. Close and tape the box top. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams and no less than 3 inches of tape overhang on each side. We recommend 2 strips of tape across the top seam and 2 strips of tape over the edge seams and 2 strips of tape across the top of the container placed diagonally. See illustration of taping method above.


6. Store the sealed Container in a secure location until shipped.

SHIPPING AND RECORD KEEPING

**Note:** Container is pre-labeled and ready to return. The marking requirements of 49 CFR 172.301(c) do not apply. The container shall not contain any markings to indicate that the contents contain controlled substances.

1. Ship in accordance with the DOT Special Permit. Container comes pre-paid and pre-labeled for shipping.

2. When the Liner is shipped, complete column 5 on the Serialization Tracking Sheet. The completed Serialization Tracking Sheet is a record of Liner Events and should be filed in accordance with DEA guidelines.

3. Maintain a copy of the completed Serialization Tracking Sheet in your files for at least 2 years (at the collector’s registered location). Refer to 21 CFR § 1304.04(a).

4. Inmar will maintain your modified Form 41 noting destruction date and time on file and will provide it to you upon request.

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QUICK STEPS

TO START

01  Install the Consumer Drug Take-Back Receptacle per DEA guidelines.
02  Properly tape container at bottom.
03  Place Serialized Inner Liner inside with top folded over container flaps.
    (When inserting Serialized Inner Liner, check to ensure Serial Number on Inner Liner matches Serial Number on the shipping container.)
04  Place absorbent pad in bottom of Serialized Inner Liner.
05  Document the installation of the container on the Serialization Tracking Sheet.
06  Install container inside Consumer Drug Take-Back receptacle.
07  Lock bottom door and unlock top door to begin drug take-back collection.

TO CLOSE

01  Open bottom door.
02  Remove full container, total weight of container may not exceed 66lbs in weight.
03  Ensure the Serial Number is visible before using a zip tie to secure Serialized Inner Liner bag top.
04  Document the removal of the container on the Serialization Tracking Sheet.
05  Properly tape container at top.
06  Container is pre-labeled for return shipment.

NOTE: All direct contact with the unsealed Consumer Drug Take-Back liner must be performed by two pharmacy personnel.
### Instructions:
Each Inner Liner (container) will bear a permanent, unique identification number to enable tracking on the Inner Liner form. Columns 1 and 2 are to be completed upon receipt of Inner Liner. Column 3 is to be completed upon installation of the container into the collection receptacle. Column 4 is to be completed upon removal of the container from the collection receptacle. Column 5 is to be completed if the Inner Liner is removed from the receptacle and placed in storage before being shipped. Column 6 should be completed when the inner liner is shipped for destruction. Maintain a copy of the completed “Inner Liner form” and other records, as applicable, on file at the collector’s registered location for at least 2 years.

The purpose of this form is to document the use of the Inner Liner throughout a collection event. Although proper use of this form is intended to help the collector meet record keeping requirements, requirements may vary based on the registrant location. It is the responsibility of each registered collector to understand and comply with all federal, state and local regulatory requirements pertaining to take-back pharmaceuticals applicable at the collector’s registered location. The Inner Liner form is not a DEA Form 41.

### DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM

<table>
<thead>
<tr>
<th>Name of Collecting Pharmacy</th>
<th>Address of Collecting Pharmacy</th>
<th>Collecting Pharmacy DEA #:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Size of Liner</th>
<th>Address of Reverse Distributor/Disposal Site</th>
<th>Reverse Distributor/Disposal Site DEA #:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1 SERIAL NUMBER</th>
<th>2 Date Liner Acquired (1 Signature)</th>
<th>3 Date Liner Installed (2 Names &amp; Signatures)</th>
<th>4 Date Removed (2 Names &amp; Signatures)</th>
<th>5 Date Transferred to Storage (2 Names &amp; Signatures)</th>
<th>6 Date Shipped (2 Names &amp; Signatures)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ex: 32587</td>
<td>4/26/19</td>
<td>4/26/19</td>
<td>5/26/19</td>
<td>5/26/19</td>
<td>5/27/19</td>
</tr>
<tr>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
</tr>
<tr>
<td>Sally Smith</td>
<td>Sally Smith</td>
<td>Sally Smith</td>
<td>Sally Smith</td>
<td>Sally Smith</td>
<td>Sally Smith</td>
</tr>
</tbody>
</table>

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SERIAL NUMBER</th>
<th>Date Liner Acquired (1 Signature)</th>
<th>Date Liner Installed (2 Names &amp; Signatures)</th>
<th>Date Removed (2 Names &amp; Signatures)</th>
<th>Date Transferred to Storage (2 Names &amp; Signatures)</th>
<th>Date Shipped (2 Names &amp; Signatures)</th>
</tr>
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<tr>
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<tr>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
<td>John Jones</td>
</tr>
<tr>
<td>Sally Smith</td>
<td>Sally Smith</td>
<td>Sally Smith</td>
<td>Sally Smith</td>
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<tr>
<td>Sally Smith</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Instructions: Each Inner Liner (container) will bear a permanent, unique identification number to enable tracking on the Inner Liner form. Columns 1 and 2 are to be completed upon receipt of Inner Liner. Column 3 is to be completed upon installation of the container into the collection receptacle. Column 4 is to be completed upon removal of the container from the collection receptacle. Column 5 is to be completed if the Inner Liner is removed from the receptacle and placed in storage before being shipped. Column 6 should be completed when the inner liner is shipped for destruction. Maintain a copy of the completed “Inner Liner form” and other records, as applicable, on file at the collector’s registered location for at least 2 years.

The purpose of this form is to document the use of the Inner Liner throughout a collection event. Although proper use of this form is intended to help the collector meet record keeping requirements, requirements may vary based on the registrant location. It is the responsibility of each registered collector to understand and comply with all federal, state and local regulatory requirements pertaining to take-back pharmaceuticals applicable at the collector’s registered location. The Inner Liner form is not a DEA Form 41.
INSTALLATION INSTRUCTIONS

ANCHOR FOR CONCRETE FLOOR

SCREW FOR WOOD FLOOR

INSTALLATION

STEP 1: PLACE CABINET IN PERMANENT LOCATION

STEP 2: USING THE CABINET BASE AS A TEMPLATE, MARK FLOOR USING CLEARANCE HOLES AS SHOWN IN FIGURE 1

STEP 3: DRILL HOLES FOR FLOOR SUBSTRATE

FIGURE 1

Use four clearance holes in bottom for securing cabinet to floor.

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Appendix C: Kiosk Signage

CONSUMER DRUG TAKE-BACK
(PROGRAMA DE ELIMINACIÓN DE MEDICAMENTOS)

1. Pull to open drawer
   Jale para abrir el cajón

2. Place medications inside
   Coloque los medicamentos adentro

3. Close the drawer
   Cierre el cajón

ACCEPTED (ACEPTADOS)
Unused or expired prescription medication
Medicamentos con receta no consumidos o vencidos
Unused or expired over-the-counter medication
Medicamentos de venta libre, no consumidos o vencidos
Pet Medication
Medicamentos para mascotas

NOT ACCEPTED (NO ACEPTADOS)
Schedule I controlled substances
Sustancias controladas de clasificación I
Illegal drugs
Drogas ilegales
Mercury-Containing Thermometers
Termómetros de Mercurio
Needles
Agujas

See Directions on Top of Box (Instrucciones arriba de la caja)
For more information, visit rxdisposal.lifeincheck.com or call 1-800-123-4567

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Discreet, safe and responsible drug disposal is critical in the fight against the opioid crisis.

**DID YOU KNOW?**

- **197** Americans die every day from a drug overdose  
  *(National Center for Health Statistics)*

- **Each day, more than 1,000** people are treated in emergency departments for not using prescription opioids as directed  
  *(Centers for Disease Control and Prevention)*

- **77%** of opioid prescription medications taken by new users are obtained from a friend or relative  
  *(U.S. Department of Health and Human Services)*

- **62%** of teens who admit taking medication for non-medical reasons say they get drugs from medicine cabinets in their homes  
  *(National Survey on Drug Use and Health, SAMHSA)*

**TOGETHER, WE CAN MAKE A DIFFERENCE!**

Tell your friends and relatives about this safe drug disposal location.

For more information on safe drug storage and disposal, as well as information on additional collection options, visit rxdisposal.lifeincheck.com or call 1-800-123-4567.
Appendix D: Promotion Material

1. Sample Education Materials

NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

SATURDAY, OCTOBER 26, 2019

NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

- Unused or expired prescription medications are a public safety issue, leading to accidental poisoning, overdose, and abuse.
- Pharmaceutical drugs can be just as dangerous as street drugs when taken without a prescription or a doctor's supervision.
- The non-medical use of prescription drugs ranks second only to marijuana as the most common form of drug abuse in America.
- The majority of teenagers abusing prescription drugs get them from family and friends and the home medicine cabinet.
- Unused prescription drugs thrown in the trash can be retrieved and abused or illegally sold. Unused drugs that are flushed contaminate the water supply. Proper disposal of unused drugs saves lives and protects the environment.

TAKE-BACK PROGRAMS ARE THE BEST WAY TO DISPOSE OF OLD DRUGS.

- But if a program is not available:
  - Take the meds out of their bottles;
  - Mix the medicines (do not crush tablets or capsules) with an unpalatable substance such as dirt, kitty litter, or used coffee grounds. This prevents the diversion of medicines from the trash.
  - Place the mixture in a container such as a zip-lock or sealable plastic bag, and throw the container away in your household trash.

FOR MORE INFORMATION ON PRESCRIPTION DRUG ABUSE, GO TO:

wwwlda.gov
www.getsmartaboutdrugs.com
www.justthinktwice.com
EVERY DAY IS CONSUMER DRUG TAKE-BACK DAY
Working together to protect our families, communities and environment.

HOW IT WORKS
1. Pull to open drawer
2. Place medications inside
3. Close the drawer

SAFELY DISPOSE OF YOUR UNUSED OR EXPIRED MEDICATIONS!

GO TO RXDISPOSAL.LIFEinCHECK.COM TO FIND A RECEPTACLE NEAR YOU

DID YOU KNOW?

192 AMERICANS die every day from a drug overdose.¹

46 MILLION people at minimum in 24 major American metropolitan areas are exposed to pharmaceutical compounds in drinking water.²

83% OF PEOPLE who misuse prescription pain relievers including opioids get them from a friend, relative or others.³

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2. Sample Authorized Collector Marketing Support

SOCIAL MEDIA

Twitter: Crafting the Perfect Tweet

Twitter is a simple way to quickly share short pieces of information. Twitter posts can be up to 140 characters in length, but 100 characters is the ideal length for maximum distribution. Including images in your tweets will make them stand out in the Twitter feed; these images should be 1080 x 512 pixels.

Facebook: Appealing to Your Audience

Facebook allows you to share lengthier posts with slightly larger images. However, longer isn’t always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 160 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 628 pixels.

SAMPLE POSTS

Copy and paste the following social media posts into your Facebook or Twitter to spread the word about the importance of properly managing leftover pharmaceuticals and drive people to your location. You can also combine them with some of the facts below to drive awareness of the importance of consumer drug take-back programs. Be sure to add one of the accompanying images and to fill in your location’s name.

Announcing our new Consumer Drug Take-Back program to safely dispose of unused medications at OUR LOCATION.

OUR LOCATION wants to help you protect your loved ones, the community and the environment! Now you can dispose of unused meds here.

OUR LOCATION wants to help you protect your loved ones, the community and the environment by offering free unused meds disposal.

Get leftover meds? Drop them off at OUR LOCATION – free and easy.

Visit OUR LOCATION to drop off your leftover meds for free – no questions asked.

Leaving leftover drugs in the home can pose health and environmental dangers. Safely dispose of them today at OUR LOCATION.

Drop off your unwanted prescription and OTC meds in the green box at OUR LOCATION.

Rid your home of dangerous, leftover meds today. Bring them to OUR LOCATION to dispose of them safely – no questions asked!

Do you have leftover drugs in your medicine cabinet? Now you can dispose of them easily and safely at OUR LOCATION.

Safe prescription drug disposal is easy. Just find the green box in OUR LOCATION.

Do the right thing: don’t flush your meds. Return leftover drugs to a safe take-back location like our green box at OUR LOCATION.

Do the right thing: don’t flush your meds. Bring them to OUR LOCATION for proper disposal.

Protect your community – bring your leftover meds to a safe drug take-back program like ours at OUR LOCATION.

Help us stop the opioid epidemic. Dispose of your unused meds at OUR LOCATION.
DID YOU KNOW?

192 AMERICANS die every day from a drug overdose.*

AT

EVERYDAY IS CONSUMER DRUG TAKE-BACK DAY

Go to rxdisposal.Lifeincheck.com to find a receptacle near you

*Lc.gov

SAFELY DISPOSE OF YOUR UNUSED OR EXPIRED MEDICATIONS!

SAMPLE PRESS-RELEASE

Use the template included in the press release folder or copy and paste the below to customize your press release and send to local media outlets in your area.

FOR IMMEDIATE RELEASE

CONTACT:
[Insert contact name here]
[Insert contact title here]
[Insert phone number]
[Insert contact email address]
[Insert website and/or social media]

[Insert pharmacy name] announces convenient drug takeback program for leftover household medications

[City, State Today’s Date] – [Pharmacy Name] announced today that it has established a convenient medication takeback program for easy disposal of leftover, unused, and out-of-date prescription and over-the-counter medications.

“We strive to help reduce the risk of drugs in the home that can potentially harm children, teens or adults,” [Name of Pharmacy Manager or Owner, of Pharmacy Name]. “We want to remind people that they should not flush drugs down the toilet. Traces of drugs can appear in community drinking water. Our drug disposal unit, which is easily accessible in the pharmacy, is a great answer to that problem and it’s simple to do. All they do is just come in, look for the big green receptacle and take it from there. Cough can be dropped off with no questions asked.”

[Pharmacy Manager/Owner’s Last Name] said there are some things that can’t be taken in the receptacles, such as inhalers and needles, but pharmacy staff will be on hand to help determine what to do. The collection receptacle will be available in the pharmacy at [address, days and hours].

[Pharmacy Name] partnered with Inmar to manage this drug take-back program. The company has a strong history as the industry leader in handling prescription and over-the-counter drug returns safely, securely and discreetly for major and regional chain drug stores as well as independent pharmacies and hospitals across the U.S.
3. Website Interface and Functionality

Every day in America 1,000+ people are treated in emergency rooms for prescription drug abuse and 192 die from drug overdoses. According to the National Institute on Drug Abuse, 18 million people in the U.S. over the age of 12 have misused medications at least once in the past year. The opioid epidemic is impacting communities and families across the U.S. - from rural farm towns to highly populated urban areas and across every demographic.

**JOIN US AND HELP FIGHT THE OPIOID EPIDEMIC**

LifeInCheck Consumer Drug Take-Back is working to help educate Americans on the dangers of leaving prescription drugs unattended in the home. From diminishing the risk of drug abuse to helping protect the environment, disposing of your medications properly makes your community a healthier, safer place. Simply enter your city and state or zip code and search radius and we will provide a list of safe drug disposal locations in your area.
IN THE NEWS

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4. Sample Social Influencer Content
Appendix E: Applicable Permits and Licenses

The following permits have been provided on the following pages:
1. Clean Harbors DEA Registrations
2. Clean Harbors Enforcement History
3. Department of Transportation - Special Permit Authorization
<table>
<thead>
<tr>
<th>DEA REGISTRATION NUMBER</th>
<th>THIS REGISTRATION EXPIRES</th>
<th>FEE PAID</th>
</tr>
</thead>
<tbody>
<tr>
<td>RC0331049</td>
<td>08-31-2020</td>
<td>$1523</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SCHEDULES</th>
<th>BUSINESS ACTIVITY</th>
<th>ISSUE DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,2,2N, 3,3N,4,5</td>
<td>REVERSE DISTRIB-COLLECTOR</td>
<td>09-03-2019</td>
</tr>
</tbody>
</table>

**CLEAN HARBORS ARAGONITE**
11600 NORTH APTUS ROAD
DUGWAY, UT 84022

Sections 304 and 1008 (21 U.S.C 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

**THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.**
<table>
<thead>
<tr>
<th>Date Received</th>
<th>Agency</th>
<th>Enforcement Type</th>
<th>Alleged Violation</th>
<th>Proposed Penalty</th>
<th>Status</th>
<th>Resolution Date</th>
<th>Penalty Paid</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/20/2016</td>
<td>UDEQ</td>
<td>Notice of Violation</td>
<td>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.</td>
<td>$0.00</td>
<td>Resolved w/o Penalty</td>
<td>12/14/2016</td>
<td>$0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>EA Number:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Description of Resolution:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Repaired the tanks.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2/8/2017</td>
<td>UDEQ - DDW</td>
<td>Notice of Violation</td>
<td>Failure to monitor and report for pesticides and volatile organic compounds in 2016.</td>
<td>$0.00</td>
<td>Resolved w/o Penalty</td>
<td>2/15/2017</td>
<td>$0.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>EA Number:</strong></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Description of Resolution:</strong></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Updated testing was conducted.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5/16/2018</td>
<td>UDEQ - Division of Air Quality</td>
<td>Notice of Violation</td>
<td>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.</td>
<td>$23,750.00</td>
<td>Resolved</td>
<td>5/21/2018</td>
<td>$23,750.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>EA Number:</strong></td>
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<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Description of Resolution:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>EA Number</th>
<th>Description of Resolution</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Payment of a civil penalty.</td>
</tr>
</tbody>
</table>

$120,000.00  Resolved  5/8/2019  $96,000.00
SPECIAL PERMIT AUTHORIZATION

DOT-SP 20255

EXPIRATION DATE: 2021-07-31

GRANTEE: INMAR RX SOLUTIONS, INC.
FORT WORTH, TX

In response to your August 12, 2019 application for party status to DOT-SP 20255 and additional information dated August 22, 2019, INMAR RX SOLUTIONS, INC. is hereby granted party status to DOT-SP 20255 as a shipper only in accordance with 49 CFR 107.107.

Copies of this special permit may be obtained by accessing the Office of Hazardous Materials Safety Homepage at http://www.phmsa.dot.gov/hazmat/regs/sp-a/special-permits/search. The most recent revision of the special permit supersedes all previous revisions of the special permit. Photo reproductions and legible reductions of this special permit are permitted. Any alteration of this special permit is prohibited.

If you have questions regarding this action please call the Office of Hazardous Materials Safety, Approvals and Permits Division at (202)366-4535.

Issued in Washington D.C. on September 04, 2019.

for William Schoonover
Associate Administrator for Hazardous Materials Safety

Tracking Number: 2019085496   DUNS Number on file: 613608574
THANK YOU.

INMAR.COM
linkedin.com/company/inmar/

635 Vine Street,
Winston-Salem, NC 27101