

The logo for MED-Project, with "MED" in orange and "Project" in teal, followed by a trademark symbol.

**MED-Project**<sup>TM</sup>

Medication Education & Disposal

# A Product Stewardship Plan For Unwanted Medicine from Households

Santa Clara County, California  
March 4, 2019

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## I. Introduction

MED-Project LLC (“MED-Project”), on behalf of the participating companies as described in [Appendix A](#) submits this Product Stewardship Plan (“Plan”) for Unwanted Medicine in compliance with the County of Santa Clara Safe Drug Disposal Ordinance, County of Santa Clara Ordinance Code Division B11, Chapter XX (“Ordinance”) and the Santa Clara County Safe Drug Disposal Regulations (“Regulations”). The Ordinance requires pharmaceutical Producers<sup>1</sup> to develop a Product Stewardship Program to finance and manage the collection, transportation, and disposal of Unwanted Medicine from Santa Clara County households.

## II. Contact Information

The primary contact person for MED-Project is:

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## III. Plan Definitions

**Board of Pharmacy** is the California State Board of Pharmacy.

**Call Center** is the MED-Project call center for Residents, which can be reached by callers at the toll-free number of 1-844-MED-PROJECT or 1-844-633-7765.

**Carrier** is the common carrier used to transport Unwanted Medicine.

**County** means the County of Santa Clara, California.

**DEA** is the U.S. Drug Enforcement Administration.

**DEA Rule** is the DEA Final Rule, “Disposal of Controlled Substances,” 79 Fed. Reg. 53520 *et seq.*, adopted on September 9, 2014.

**DOT** is the U.S. Department of Transportation.

**FDA** is the U.S. Food and Drug Administration.

**Help Desk** is the MED-Project call center and email-in database for Kiosk Drop-Off Sites, Mail-Back Distribution Locations and other non-Residents, which can be reached by callers at a toll-free number and/or by email at [santaclaracounty@med-project.org](mailto:santaclaracounty@med-project.org).

**Inhaler Mail-Back Services** is the provision of pre-paid, pre-addressed packages for the collection and disposal of inhalers (“**Inhaler Mail-Back Packages**”) by Vendor.

**Injector Mail-Back Services** is the provision of pre-paid, pre-addressed, FDA-cleared sharps containers for the collection and disposal of Pre-filled Injector Products (“**Injector Mail-Back Packages**”) by Vendor.

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<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have their respective meanings set forth in the Ordinance and Regulations.

**Kiosk Drop-Off Site** is a location that is accessible to the public, hosting a MED-Project kiosk for the collection of Unwanted Medicine.

**Kiosk Drop-Off Site Host** is the designated contact person or persons at the Kiosk Drop-Off Site.

**Law Enforcement Agency** or **LEA** is a federal, state, tribal, or local law enforcement office or agency.

**Mail-Back Distribution Location** is a site that is accessible to the public, such as a fire station or library, which provides MED-Project Mail-Back Packages to Residents.

**Mail-Back Services** is the provision of pre-paid, pre-addressed containers, envelopes, or packages (“**Mail-Back Packages**”) for the collection and disposal of Unwanted Medicine.

**Maintenance Technicians** are service personnel who are trained to provide services related to kiosks that are part of the Program. This includes, but is not limited to, responding to damaged kiosks.

**MED-Project Website** is the Internet website located at [www.med-project.org](http://www.med-project.org) or [www.medproject.org](http://www.medproject.org).

**Plan** or **Product Stewardship Plan** is the product stewardship plan presented in this submittal by MED-Project.

**Pre-filled Injector Products** are pre-filled injector products with a retractable or otherwise securely covered needle where medicine cannot be removed from them or where they contain more than trace amounts of Covered Drugs.

**Program** or **Product Stewardship Program** is the product stewardship program set forth in this Product Stewardship Plan.

**Required Languages** are English, Spanish, Vietnamese, Mandarin, Tagalog, Korean, Japanese, and Hindi.

**Residents** means human beings residing in the County. “Residents” does not include business generators of pharmaceutical waste, such as hospitals, clinics, doctor’s offices, veterinary clinics, pharmacies, or airport security and law enforcement drug seizures.

**Service Convenience Requirement** means the requirements established in Ordinance § B11-545(b)(1).

**Service Technicians** are personnel trained to service Program kiosks.

**Standard Mail-Back Services** is the provision of pre-paid, pre-addressed envelopes for the collection and disposal of Unwanted Medicine (“**Standard Mail-Back Packages**”) by Vendor.

**Take-Back Event** is a one-day event at a location accessible to the public, conducted by MED-Project, for the collection of Unwanted Medicine from Residents.

**Technician-Assisted Collection Kiosk Drop-Off Site** is a location hosting a MED-Project kiosk for the collection of Unwanted Medicine that is accessible to the public where boxes and inner liners will be removed from kiosks, sealed, and packaged by the Service Technicians and transported to a disposal facility by Carrier.

**Technician-Assisted Collection Kiosk Drop-Off Site Host** is the designated contact person or persons at the Technician-Assisted Collection Kiosk Drop-Off Site.

**Unwanted Medicine** is defined in Section IV of this Plan.

**Vendor** is any vendor retained by MED-Project to carry out its obligations under the Program.

## IV. Unwanted Medicine<sup>2</sup>

For the purposes of the Plan, “Unwanted Medicine” includes all materials identified as “Covered Drug[s]” under Ordinance § B11-540(d) that qualify as “Unwanted Covered Drug[s]” under Ordinance § B11-540(w). Per the Ordinance, Covered Drug means “a Drug sold in any form and used by County Residents, including Prescription Drugs, Nonprescription Drugs, brand name Drugs, and generic Drugs.” § B11-540(d). Unwanted Medicine does not include the following:

- i. Expired undispensed samples direct from physicians’ offices;
- ii. Unused or expired drugs from hospitals and institutions;
- iii. Bulk animal pharmaceuticals from farms (business use);
- iv. Vitamins or supplements;
- v. Herbal-based remedies and homeopathic drugs;
- vi. Compressed cylinders and mercury containing thermometers;
- vii. Cosmetics, shampoos, sunscreens, toothpaste, lip balm, antiperspirants, or other personal care products that are regulated as both cosmetics and nonprescription drugs under the federal Food, Drug, and Cosmetic Act (Title 21 U.S.C. Chapter 9);
- viii. Hard surface and toilet disinfectant cleaners;
- ix. Drugs administered in a healthcare setting;
- x. Drugs for which Producers provide a pharmaceutical product stewardship or take-back program as part of an FDA managed risk evaluation and mitigation strategy (Title 21 U.S.C. § 355-1);
- xi. Drugs that are biological products, meaning any virus, therapeutic serum, toxin, antitoxin, or analogous product applicable to the prevention, treatment or cure of diseases or injuries of man, as these terms are defined by 21 C.F.R. § 600.3(h), if the Producer already provides a pharmaceutical product stewardship or take-back program;
- xii. Medical devices or their component parts or accessories from which Unwanted Medicine can be removed;
- xiii. Used, empty containers, vials, and pouches; and
- xiv. Schedule I or other illicit drugs.

See Section XIV.A for collection limitations imposed by the DEA Rule.

## V. Collection of Unwanted Medicine

The Plan provides services to collect Unwanted Medicine, including controlled substances. The collection methods and any applicable legal requirements are described below.

### A. Unwanted Medicine Collection Program

#### 1. Outreach

Per Ordinance § B11-541(e)(3), MED-Project initially notified all 291 sites with a licensed pharmacy and 26 LEA locations in the County of the opportunity to participate as a Kiosk Drop-Off Site. MED-Project continues to periodically perform outreach to these locations via calls, emails, and site visits, with the goal of establishing Kiosk Drop-Off Sites distributed as uniformly as possible throughout the County. As part of this outreach, MED-Project asks if the sites are interested in participating in the Program, whether the sites currently host a kiosk or provide other services for the disposal of Unwanted Medicine, whether pharmacies are DEA registrants, and if the sites would like more information regarding the Program.

LEAs and pharmacies that currently host kiosks in the County may transition into the Program upon entering into an agreement with MED-Project.

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<sup>2</sup> Unwanted Medicine collected at Kiosk Drop-Off Sites does not include Pre-filled Injector Products.

## **2. Implementation**

MED-Project continues to work to satisfy the Service Convenience Requirement through executed agreements with Kiosk Drop-Off Site Hosts. MED-Project will satisfy the Service Convenience Requirement in any supervisorial district in which executed agreements have not been obtained for the minimum number of Kiosk Drop-Off Sites through Mail-Back Distribution Locations. *See* Section V.A.3 for details on how the Program will satisfy the Service Convenience Requirement.

Collection of Unwanted Medicine begins at Kiosk Drop-Off Sites once agreements have been executed with each location, kiosks have been installed, sites have been trained, and, in the case of pharmacies, all requirements of the DEA and Board of Pharmacy have been met.

## **3. Convenience**

Per Ordinance § B11-545(b)(1), MED-Project will strive to establish at least one Kiosk Drop-Off Site for every 20,000 Residents, with a minimum of ten (10) kiosks per supervisorial district. In Supervisorial Districts where a sufficient number of Kiosk Drop-Off Sites cannot be established, MED-Project will establish two Mail-Back Distribution Locations for each missing Kiosk Drop-Off Site necessary to satisfy the Service Convenience Requirement. MED-Project will discontinue Mail-Back Distribution Locations as it obtains additional agreements with Kiosk Drop-Off Sites necessary to satisfy the Service Convenience Requirement.

Standard Mail-Back Services will be available upon request for disabled and home-bound Residents via the Call Center and MED-Project Website, offering more opportunities to dispose of Unwanted Medicine.

## **4. Services**

MED-Project will assess performance, gauge feedback, and revise its approach as appropriate. As implementation proceeds, MED-Project shall continue outreach to organizations that may be available as future Kiosk Drop-Off Sites on a periodic basis, such as those listed in [Appendix B](#).

As required under Ordinance § B11-545(b)(4), the Program will include as a Kiosk Drop-Off Site any retail pharmacy, including retail pharmacies operated by the County, or any LEA willing to serve voluntarily as a Kiosk Drop-Off Site for Unwanted Medicine and able to meet all applicable laws, regulations, and other legal requirements. Locations currently serving as a drop-off site may participate in the Program by executing an agreement with MED-Project and modifying their DEA registration (if required). MED-Project will work with the Kiosk Drop-Off Site Host to transition to the Program and Vendor.

Over the course of implementation, additional Kiosk Drop-Off Sites will be established to the extent that additional LEAs and/or DEA-registered collector pharmacies agree to participate.

Mail-Back Distribution Locations shall supplement Kiosk Drop-Off Sites if the Service Convenience Requirement is not met through executed agreements with Kiosk Drop-Off Site Hosts.

Although Kiosk Drop-Off Sites will not provide kiosk collection for Pre-filled Injector Products, Injector Mail-Back Services for Pre-filled Injector Products will be available through the Call Center and MED-Project Website for all Residents.

## B. Kiosk Drop-Off Sites

Kiosk Drop-Off Sites will be strategically placed across the County to best meet the Service Convenience Requirement established by the Ordinance.

### 1. Kiosk Drop-Off Site Locations

MED-Project initially contacted 291 sites with a licensed pharmacy and 26 LEAs located in the County about the opportunity to serve as a Kiosk Drop-Off Site Host. MED-Project outreach to sites began with a letter to potential collection sites in April 2016, informing the sites of the upcoming Program, followed by calls, emails, and faxes to sites that did not respond to the letter. Upon receipt of the Notice of Determination issued in March 2017 from the County, MED-Project performed additional outreach in April 2017 using a combination of letters, faxes, emails and phone calls to potential sites. Potential sites were separated into LEA, independent pharmacy, hospitals/clinics with an onsite pharmacy, and chain pharmacy categories. Chain pharmacies and health systems were approached at the headquarters level based upon the presence of sites across multiple jurisdictions.

All independent pharmacies and LEAs had multiple methods of contact in April 2017. This phase of the outreach campaign sought to familiarize sites with the Program and MED-Project, followed by phone calls and emails focused on recruiting interested sites and distributing agreements. In-person site visits began in May 2017 once specific points of contact at potential sites were determined. Where possible, MED-Project partnered with Santa Clara County to educate and encourage potential sites to participate. MED-Project continued to perform outreach to potential sites from May through December 2017 via emails, phone calls and in-person site visits on a frequent basis, while balancing the needs to meet the Service Convenience Requirement with outreach fatigue on the part of potential sites.

#### Method of Contact Summary

| 2017        | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|-------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Letters     |     |     |     | ✓   |     |     |     |     |     |     |     |     |
| Fax         | ✓   |     |     | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   |
| Email       |     |     |     | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   |
| Phone Calls |     |     |     | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   |
| Site Visits |     |     |     |     | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   | ✓   |

Of the locations contacted, 149 pharmacies and 16 LEAs expressed interest in participating in the Program. Kiosk Drop-Off Sites that are interested in or currently participating in the Program are identified in [Appendix C](#).

MED-Project will continue outreach to potential Kiosk Drop-Off Site Hosts that are not participating in the Program according to Ordinance Section B11-541(e)(3), with annual notification letters sent to non-participating or new Retail Pharmacies, such as sites listed in [Appendix D](#).

## 2. Drop-Off Site Kiosk Placement and Maintenance Program

Kiosk installation shall be the responsibility of MED-Project at LEAs and pharmacy Kiosk Drop-Off Sites when the Kiosk Drop-Off Site Host has identified a compliant placement location. All kiosks in the Program must be securely placed and maintained inside a collector's registered location or LEA's physical location in accordance with DEA Rule §§ 1317.75(d)(1) and 1317.35(a). At pharmacies, kiosks will be placed in the immediate proximity of a designated area where controlled substances are stored and at which an employee is present (*i.e.*, can be seen from the counter), pursuant to § 1317.75(d)(2). At a hospital or clinic with an on-site pharmacy, kiosks will be placed in an area regularly monitored by employees but not near areas of the facility where emergency or urgent care is provided. § 1317.75(d)(2)(i). Kiosk placement will also comply with any applicable Board of Pharmacy requirements. Costs associated with installation and maintenance will be paid by MED-Project per the contracts with the Kiosk Drop-Off Site Hosts.

The maintenance program will address items such as:

- Inspection of kiosks to monitor general wear and tear;
- Service Technician access to kiosks at Technician-Assisted Collection Kiosk Drop-Off Sites during regularly scheduled pick-ups and notification of a Maintenance Technician if necessary; and
- Reporting by the Kiosk Drop-Off Site Host of damage to a kiosk or requested maintenance service. A summary of the requested maintenance log will be available upon request within 90 days of Plan approval.

## 3. Kiosk Specifications

A kiosk will be offered to all eligible host locations. Pursuant to § 1317.75(e), MED-Project kiosks at pharmacies will:

- Be securely fastened to a permanent structure;
- Be securely locked, substantially constructed containers with a permanent outer container and removable inner liner;
- Include a small opening in the outer container that allows contents to be added to the inner liner, but does not allow removal of the inner liner's contents;
- Prominently display a sign indicating that only Schedule II-V controlled and non-controlled substances are acceptable to be placed in the kiosk; and
- Have the small opening in the outer container locked or made inaccessible to the public when a Kiosk Drop-Off Site employee is not present.

The proposed design of the pharmacy kiosk and proposed signage ([Appendix E](#)) satisfies these requirements through the use of heavy gauge steel; multiple locking mechanisms, including a locking mechanism on the drop-slot; a tamper-resistant slot; and commercial hinges.<sup>3</sup> The design will increase the likelihood of consumer participation by providing easy access to wheelchair users. The locking mechanism on the drop-slot will prevent kiosk overflow once the container has reached its maximum level and is locked by the Kiosk Drop-Off Site Host. MED-Project pharmacy kiosks will come with appropriate regulatory signage and instructions, including an instruction to remove personal information from any Unwanted Medicine and packaging before depositing them and language required under the DEA Rule and by the Board of Pharmacy.<sup>4</sup> Kiosk signage will provide information about what is and is not accepted in the kiosk.

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<sup>3</sup> If applicable, MED-Project will coordinate with other approved product stewardship plans to develop clear standardized instructions for Residents to use kiosks and a consistent design. [Appendix E](#) provides the kiosk design and signage MED-Project expects to propose when coordinating with other approved product stewardship plans.

<sup>4</sup> Specifically, as required under § 1317.75(e)(4), all kiosks will prominently display a sign stating that: "Only Schedule II-V controlled and non-controlled substances that are lawfully possessed by the ultimate user are acceptable to be placed in the kiosk. Schedule I controlled substances, illicit or dangerous substances, and any controlled substances not lawfully possessed by the ultimate user may not be placed in the kiosk."

Additionally, under § 1317.60(a), MED-Project kiosk inner liners will:

- Be waterproof, tamper-evident, and tear-resistant;
- Be removable and sealable immediately upon removal without emptying or touching kiosk contents;
- When sealed, make the contents of the inner liner not viewable from the outside;
- Clearly indicate the size of the inner liner; and
- Bear a permanent, unique identifier for tracking purposes.

MED-Project kiosks and inner liners will also comply with Board of Pharmacy requirements.

While the DEA Rule does not require LEA kiosks to meet these same requirements, MED-Project will offer these kiosks and inner liners to LEAs. *See* DEA Rule at 53531.

#### **4. Kiosk Collection**

Under § 1317.05(c)(2)(iv), pharmacy Kiosk Drop-Off Site Hosts must dispose of sealed inner liners and their contents either on-site, through common or contract carrier delivery to or pick-up by a reverse distributor or distributor, or with DEA assistance.

Section 1317.75(c) prohibits the counting, sorting, inventorying, or individual handling of any substances deposited into a pharmacy kiosk. Additionally, § 1317.60 limits inner liner access to employees of the collector and requires two employees to immediately seal the inner liner upon its removal from the pharmacy kiosk's permanent outer container. *See* § 1317.60(b), (c). Section 1317.75(g) provides that pharmacy kiosk inner liner installation or removal shall be performed "by or under the supervision of at least two employees of the authorized collector." The pharmacy kiosk sealed inner liner must not be opened, x-rayed, analyzed, or otherwise penetrated. *See* § 1317.60(c).

At LEA Kiosk Drop-Off Sites, Vendor and the LEA will maintain any records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence pursuant to § 1317.35. LEAs will record the unique identifier and size of the sealed inner liner transferred to Vendor. *See* § 1317.35. Additionally, any Unwanted Medicine will be stored in a manner to prevent the diversion of controlled substances and consistent with the LEA's standard procedures for storing illicit controlled substances. *See* § 1317.35. Collected Unwanted Medicine will be transferred to the disposal facility in a manner to prevent the diversion of Unwanted Medicine and consistent with the LEA's standard procedures for transferring illicit controlled substances. *See* § 1317.35.

MED-Project's Kiosk Drop-Off Site collection system complies with these DEA requirements for pharmacy and LEA Kiosk Drop-Off Sites. Vendor, pharmacies, and LEAs participating in the Program will keep all records required under the DEA Rule, including those required under §§ 1304 and 1317.35. Pharmacies participating in the Program will also keep all records required under Board of Pharmacy requirements. Pharmacy Kiosk Drop-Off Site Hosts and Vendor will be instructed never to count, sort, inventory, or individually handle kiosk contents.

Pharmacy kiosks at Technician-Assisted Collection Kiosk Drop-Off Sites will be located where an employee is present affording employees the opportunity to visually inspect Unwanted Medicine Residents attempt to deposit. *See* Section V.B.2. LEA kiosks will be located inside the LEA's physical location. *See* Section V.B.2. MED-Project's kiosk collection system will also comply with all applicable Board of Pharmacy requirements.

Pick-up of Unwanted Medicine collected at Technician-Assisted Collection Kiosk Drop-Off Sites will be scheduled year-round based on their regular business hours and weight collected. After arriving at a Technician-Assisted Collection Kiosk Drop-Off Site, the Service Technician will check the kiosk for any damage.

The inner liner and box will be securely removed from the kiosk by a Service Technician and Technician-Assisted Collection Kiosk Drop-Off Site Host employees following procedures meeting all DEA requirements. Specifically, two Technician-Assisted Collection Kiosk Drop-Off Site employees will hold the two keys to unlock the kiosk. Once the kiosk is unlocked, the inner liner will be removed from the kiosk and immediately sealed. The inner liner provided in the kiosk will be opaque to prevent visual recognition of the contents. The sealed inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.

Under the supervision of two Technician-Assisted Collection Kiosk Drop-Off Site Host employees, the Service Technician will seal the inner liner for packaging and transport. The unique identifier of the inner liner will be matched to the tracking number on the shipping label. The Service Technician will schedule a pick-up by Carrier to be completed within a few business days and will leave the packaged, sealed inner liner with the Technician-Assisted Collection Kiosk Drop-Off Site Host for storage in compliance with all applicable laws, regulations, and other legal requirements until Carrier pick-up.

Vendor will prepare the materials for shipment and perform applicable pre-transportation functions to comply with DOT Hazardous Materials Regulations (“HMR”).

Any collection of controlled substances by LEA will be consistent with the LEA’s standard procedures for transferring illicit controlled substances. *See* DEA Rule § 1317.35.

A review of 2017 calendar year data from MED-Project Kiosk Drop-Off Sites indicated the average time for UPS pick-ups was approximately two to three days, with no pick-ups exceeding 14 days, after the Service Technician packaged the sealed inner liner for transport. MED-Project will meet with Vendor on a regular basis to monitor service metrics, including pick-up timing.

## **5. Frequency of Pick-Up**

Initially, all Technician-Assisted Collection Kiosk Drop-Off Sites will be scheduled for a monthly pick-up from the kiosk. Vendor will communicate with MED-Project in the event that the frequency of pick-up needs to be changed based on the weight collected over time. As needed, MED-Project will communicate with the Technician-Assisted Collection Kiosk Drop-Off Site Host in the event the frequency of pick-up needs to be changed. Vendor will monitor the weight per service to ensure that all sites are receiving the appropriate service frequency. Vendor will manage pick-up services as frequently as necessary to prevent overflow of the kiosk without providing unnecessary interruption to the participating Technician-Assisted Collection Kiosk Drop-Off Site.

## **6. Procedures if a Kiosk is Full Prior to Scheduled Pick-Up**

The Technician-Assisted Collection Kiosk Drop-Off Site Host shall be instructed to lock the drop-slot to the kiosk and notify MED-Project of the need for service if prior to the scheduled date.

Vendor shall provide a network of trained Service Technicians. Vendor will communicate service requests to field managers responsible for Service Technicians. Vendor will direct service to the trained Service Technician who is in closest proximity to the Technician-Assisted Collection Kiosk Drop-Off Site Host requesting the service. This process provides for a timely response to Technician-Assisted Collection Kiosk Drop-Off Sites requiring service prior to the scheduled date.

Service timelines will be assessed based on the specific characteristics of the Technician-Assisted Collection Kiosk Drop-Off Site’s need. If necessary, Vendor will be able to respond within hours of the request. If the request does not require an urgent response, Vendor will plan the response within two to three business days of the request. Vendor will not exceed one business week from the initial request. In the interim, pharmacy Technician-Assisted Collection Kiosk Drop-Off Site Hosts shall be instructed to secure the kiosk and its contents in accordance with DEA requirements.

## **7. Unplanned Event Preparedness**

Vendor maintains a network of emergency responders that can be called on in the case of an emergency or spill incident. Vendor ensures compliance of all service providers through a business confidential qualification process. This process reviews the compliance history, management structure, financial stability, and other key indicators of a reliable emergency response service provider. Emergency responders will bring all necessary equipment in order to manage the specific needs of the Kiosk Drop-Off Site requiring emergency response. Technician-Assisted Collection Kiosk Drop-Off Site Hosts will be directed to call 911 in situations posing an immediate threat to the environment or health.

A major event, such as a flood, earthquake or fire, may require response by a service team. This event can jeopardize the security characteristics of the kiosk as well as the structural integrity of the participating location. The team will assess the safety of the area along with the locations to be serviced. Once it is determined the area is safe for access, the team will work to secure the kiosk and remove its contents.

Along with major event preparedness, Vendor provides timely responses to events that may cause an inconvenience to the Kiosk Drop-Off Site Host. An example of this kind of event would be if the kiosk is giving off an odor prior to the scheduled service date. The Kiosk Drop-Off Site Host will contact MED-Project at the dedicated Help Desk. Vendor is able to respond within two to three hours in most cases when notified of a need for emergency response. If the request is not an emergency that poses an immediate threat to the environment or health, Vendor will typically respond to a service location within two to three business days of the event.

In addition, any items that a Resident deposits into the kiosk will not be retrieved.

### **C. Take-Back Events**

MED-Project may schedule an annual Take-Back Event in each supervisorial district for each missing Kiosk Drop-Off Site necessary to satisfy the Service Convenience Requirement in that supervisorial district if each missing Kiosk Drop-Off Site is not supplemented by two Mail-Back Distribution Locations. MED-Project will continue to conduct these Take-Back Events (unless it instead provides Mail-Back Distribution Locations) until signed agreements have been obtained for the required number of Kiosk Drop-Off Sites in the supervisorial district.

MED-Project will confirm to the County the locations and dates to conduct Take-Back Events once contracts with supervising LEAs have been fully executed. Federal, state, tribal, or local law enforcement shall be in attendance at all Take-Back Events. In general, MED-Project will conduct the Take-Back Events in coordination with other scheduled events (*i.e.*, Earth Day celebrations, Health and Wellness Fairs), if possible, to maximize convenience to Residents.

Due to the dynamic schedule of Take-Back Events, the list of dates and locations will be maintained on the MED-Project website as events are scheduled and confirmed.

#### **1. Method**

Conducting Take-Back Events is contingent upon participation and oversight by contracted LEAs. MED-Project will work with participating LEAs to ensure Take-Back Events are compliant and successful. Events will be promoted and communicated to the public through local communication channels.

The process of conducting Take-Back Events will meet all applicable laws, regulations, and other legal requirements. MED-Project will contract with LEAs to oversee Take-Back Events. Vendor will provide for the collection, transportation, and disposal of Unwanted Medicine from Take-Back Events and ensure that all requirements of participating LEAs are met. MED-Project will work with LEAs to accommodate any reasonable requirements.

## 2. Procedures

MED-Project will partner with LEAs to ensure that at least one law enforcement officer oversees collection at every Take-Back Event pursuant to DEA Rule § 1317.65(a), (b). The law enforcement officers will maintain control and custody of all Unwanted Medicine collected at Take-Back Events from collection until secure transfer, storage, or destruction of the Unwanted Medicine, as required by § 1317.65(b). Only ultimate users and persons authorized to dispose of an ultimate user decedent's property in lawful possession of controlled substances in Schedules II-V may transfer these substances to the LEA during the event. § 1317.65(e). No other person will handle controlled substances at Take-Back Events under § 1317.65(e); however, Vendor may assist LEAs in the collection of Unwanted Medicine at Take-Back Events. See DEA Rule at 53539.

Take-Back Events will typically be staffed by at least two Vendor employees. Vendor will work in coordination with MED-Project and LEAs to monitor and ensure collection of all material at Take-Back Events is compliant with all applicable laws, regulations, and other legal requirements and meets the expectations of the planned event. Vendor will work in conjunction with local law enforcement to ensure all material is placed in a compliant collection receptacle and securely shipped to meet all applicable laws, regulations, and other legal requirements. Any material that is not Unwanted Medicine or does not meet legal requirements will be rejected.

Vendor and the LEA will maintain all records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence pursuant to § 1317.35. Any collected Unwanted Medicine will be stored to prevent the diversion of controlled substances and consistent with the LEA's standard procedures for storing illicit controlled substances. Any storage of Unwanted Medicine by Vendor will also comply with the applicable security requirements of § 1301 and 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances.

Vendor will package Unwanted Medicine inner liners, match the unique inner liner identifier to shipping labels, and prepare the inner liners for shipment in compliance with all applicable laws, regulations, and other legal requirements. Collected material will be weighed following the completion of each event. With the sealed inner liners remaining under the control and custody of the LEA, Vendor will assist the LEA with the transportation of the sealed inner liners to the LEA's facility. Vendor will schedule a pick-up from the LEA facility to take place within a few business days of the event.

### **D. Disposal of Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events**

Vendor and Carrier shall manage the Unwanted Medicine from Kiosk Drop-Off Sites and Take-Back Events in compliance with all applicable laws, regulations, and other legal requirements. Carrier shall deliver Unwanted Medicine collected from Kiosk Drop-Off Sites and Take-Back Events to the reverse distributor facility identified in Section X. All Unwanted Medicine will be destroyed no later than 30 calendar days after receipt at the reverse distributor facility from Carrier. All inner liners will be destroyed in accordance with all applicable laws, regulations, and other legal requirements at a disposal facility identified in Section X.

## **E. Mail-Back Distribution Locations**

MED-Project will provide two Mail-Back Distribution Locations in each supervisorial district for each missing Kiosk Drop-Off Site necessary to satisfy the Service Convenience Requirement. As MED-Project satisfies the Service Convenience Requirement through signed Kiosk Drop-Off Site agreements, it will discontinue Mail-Back Distribution Locations. Mail-Back Services will continue to be available to Residents who are disabled and home-bound through the Call Center and MED-Project Website. Mail-Back Services will continue to be available to Residents who are disabled and home-bound at five permanent Mail-Back Distribution Locations in each supervisorial district. At least three Mail-Back Distribution Locations in each supervisorial district will be accessible to the public each day of the week, including weekends, with the exception of recognized major State or Federal holidays.

Mail-Back Packages will be pre-paid and pre-addressed, and Mail-Back Services shall comply with all applicable laws, regulations, and other legal requirements.

## **F. Mail-Back Services for Unwanted Medicine**

MED-Project will provide three types of Mail-Back Services that will be available through the Call Center and MED-Project Website:

- Standard Mail-Back Services for disabled and home-bound Residents as described in Section V.F.1;
- Injector Mail-Back Services for the collection of Pre-filled Injector Products for all Residents as described in Section V.F.2; and
- Inhaler Mail-Back Services for the collection of inhalers for disabled and home-bound Residents as described in Section V.F.3.

### **1. Standard Mail-Back Services for Unwanted Medicine**

MED-Project will provide Standard Mail-Back Services at no cost to disabled and home-bound Residents via the Call Center and/or MED-Project Website and at five permanent Mail-Back Distribution Locations per Supervisorial District. Standard Mail-Back Packages will also be available at Mail-Back Distribution Locations for all Residents until the Service Convenience Requirement is met via Kiosk Drop-Off Sites. The pre-paid shipping label will direct the Standard Mail-Back Package to the facility identified in Section X. Standard Mail-Back Packages for Unwanted Medicine shall comply with all applicable laws, regulations, and other legal requirements.

Pursuant to DEA Rule § 1317.70(c), Standard Mail-Back Packages for the collection of Unwanted Medicine, not including inhalers and Pre-filled Injector Products, will be:

- Nondescript and without any markings or information potentially indicating that they contain Unwanted Medicine, including controlled substances;
- Water and spill-proof, tamper-evident, tear-resistant, and sealable;
- Pre-addressed with and delivered to Vendor's registered address;
- Pre-paid;
- Provided with a unique identifier enabling tracking; and
- Provided with instructions indicating the process for mailing back the packages, accepted substances, a notice about mailing restrictions, and a notice that only packages provided by Vendor will be accepted for destruction.

Ultimate users and persons lawfully entitled to dispose of an ultimate user decedent's property will not be required to provide any personally identifiable information when using Standard Mail-Back Services to dispose of Unwanted Medicine. *See* § 1317.70(d). As required under § 1317.70(e), Vendor will only accept Standard Mail-Back Packages it made available (or packages lawfully forwarded under DEA requirements). Within three business days of receipt, Vendor will notify the DEA if it receives Standard Mail-Back Packages likely containing controlled substances that Vendor did not make available or did not agree to receive pursuant to DEA requirements. In accordance with § 1317.70(f), when Standard Mail-Back Packages are received, only employees of Vendor will handle the Standard Mail-Back Packages. Standard Mail-Back Packages will not be opened, x-rayed, analyzed, or otherwise penetrated upon receipt by Vendor. *See* § 1317.70(f). Vendor will keep all records required under the DEA Rule, including those identified in § 1304.22(f).

## **2. Injector Mail-Back Services for Pre-filled Injector Products<sup>5</sup>**

For Pre-filled Injector Products, MED-Project will offer all Residents Injector Mail-Back Services and Injector Mail-Back Packages via the Call Center and/or MED-Project Website. Injector Mail-Back Packages will also be available at five permanent Mail-Back Distribution Locations in each Supervisorial District. The pre-paid shipping label will direct the Injector Mail-Back Package to a facility identified in Section X. An instruction sheet will be included with the Injector Mail-Back Package that describes how to properly dispose of Pre-filled Injector Products, explains what materials may be placed in a sharps container, how to use the sharps container, and how to return the Injector Mail-Back Package will be included with the Injector Mail-Back Package.

*See* [Appendix G](#) for a sample package and package specifications.

## **3. Inhaler Mail-Back Services for Inhalers**

For inhalers, MED-Project will offer disabled and home-bound Residents Inhaler Mail-Back Services and Inhaler Mail-Back Packages via the Call Center and/or MED-Project Website. Inhaler Mail-Back Packages will also be available to disabled and home-bound Residents at five permanent Mail-Back Distribution Locations in each Supervisorial District. The pre-paid shipping label will direct the Inhaler Mail-Back Packages to a facility identified in Section X. An instruction sheet will be included with the Inhaler Mail-Back Package that describes how to properly dispose of inhalers, explains what materials may be placed in the Inhaler Mail-Back Package, and how to return the Inhaler Mail-Back Package. MED-Project may add Inhaler Mail-Back Services by any Vendor(s) currently approved to provide Standard Mail-Back Services as long as the same Carrier and disposal facilities are utilized.

*See* [Appendix H](#) for sample package specifications.

## **4. Mail-Back Package Availability**

Disabled and home-bound Residents may request Mail-Back Services by calling the Call Center, or through a link on the MED-Project Website. Disabled and home-bound Residents will be able to request up to two Standard Mail-Back Packages at once through the MED-Project Website. Upon such request, Residents will be provided Standard Mail-Back Packages complying with DEA requirements. Residents requiring more than two Standard Mail-Back Packages may submit multiple requests through the MED-Project Website and by verbal request to Call Center operators. Home healthcare professionals providing services to disabled and home-bound Residents may also request Mail-Back Services on behalf of a Resident through the Call Center or through a link on the MED-Project Website. Mail-Back Packages will be shipped to Residents within five to ten business days of their request.

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<sup>5</sup> MED-Project will discontinue Injector Mail-Back Services once Sharps Mail-Back Services are available through MED-Project's stewardship program for sharps required by the County of Santa Clara Safe Sharps Disposal Ordinance, County of Santa Clara Ordinance Code Division B11, Chapter XXI.

In Supervisorial Districts where the Service Convenience Requirement has not been met via Kiosk Drop-Off Sites, MED-Project will supplement Kiosk Drop-Off Sites by establishing two Mail-Back Distribution Locations for each missing Kiosk Drop-Off Site for the dissemination of Mail-Back Packages. MED-Project will work with sites, such as fire stations and libraries, to ensure that Mail-Back Distribution Locations are conveniently located.

Mail-Back Services for inhalers will be available to disabled and home-bound Residents through the MED-Project Website and Call Center.

Injector Mail-Back Services for Pre-filled Injector Products will be available to all Residents through the Call Center and MED-Project Website.

Additionally, Mail-Back Packages for all Mail-Back Services will be available at five permanent Mail-Back Distribution Locations in each supervisorial district.

All Mail-Back Services will supply packages that contain an insert with instructions for use and information about other options for disposing of Unwanted Medicine in the Required Languages.

## **5. Mail-Back Package Collection and Disposal**

Residents will be directed to follow the instructions provided with Mail-Back Packages. Mail-Back Services shall direct packages to an approved facility in accordance with their contents and packages will be handled in compliance with all applicable laws.

For Standard Mail-Back Packages, upon arriving at the destruction facility, they shall be scanned for receipt verification and then incinerated at the disposal facility listed in Section X. Any storage of Standard Mail-Back Packages received by Vendor will comply with the applicable security requirements of DEA Rule Section 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances. All Unwanted Medicine will be destroyed promptly.

This Plan proposes to treat Injector Mail-Back Packages via incineration. See the facilities identified in Section X.

The incinerator facility for the disposal of inhalers is included in Section X.

Each Mail-Back Package has a unique identifier assigned by Vendor. Each Mail-Back Package will be tracked, using the unique identifier, upon distribution and again upon receipt for destruction. Vendor will use this information to determine the number of Mail-Back Packages distributed and received for destruction and the weight of each envelope.

## **VI. Plan and Collection Goals**

The short- and long-term goals of the Plan are described generally as follows. Additional detail on implementation is provided in Section V.A.2.

MED-Project anticipates that, once Kiosk Drop-Off Sites are fully operational, the Program will collect approximately 360 pounds per Kiosk Drop-Off Site during each calendar year, based on collection totals in other jurisdictions. Assuming approximately 90 Kiosk Drop-Off Sites are operational for a full year, MED-Project anticipates collecting approximately 32,400 pounds of Unwanted Medicine from Kiosk Drop-Off Sites in 2019. See Section V.B for more information about Kiosk Drop-Off Site collection.

Until the Service Convenience Requirement is met, MED-Project anticipates supplementing Kiosk Drop-Off Sites via Mail-Back Distribution Locations.

MED-Project Standard Mail-Back Packages have a capacity of 8 oz. per package. Due to the lack of information available from current MED-Project Programs, MED-Project's estimated collection totals in 2018

could vary based on actual usage. Collection in 2018 will be used to adjust subsequent years' collection goals.

| Goal Area                              | Short-Term   | Long-Term   |
|--|--|---|
| <b>Collection</b>                      | <p>Within 90 days of Plan approval, implement Mail-Back Services via the MED-Project Website and Call Center.</p> <p>Continue to satisfy the Service Convenience Requirement through established Kiosk Drop-Off Sites and Mail-Back Distribution Locations.</p>  | <p>Increase retail chain pharmacy participation to satisfy the Service Convenience Requirement through established Kiosk Drop-Off Sites in a minimum of four out of five Supervisorial Districts.</p> <p>Reduce the number of Mail-Back Distribution Locations.</p>   |
| <b>Education &amp; Public Outreach</b> | <p>Develop baseline number of MED-Project Website page views or unique visitors.</p> <p>Establish a baseline of LEAs; retail pharmacies; other pharmacies (healthcare, etc.); community groups; and other third parties contacted, and report appropriate statistics as outlined in the Survey and Annual Report Sections of this Plan.</p> <p>Establish a baseline number of media outlets receiving press advisory, with a minimum of five outlets.</p> <p>Establish a baseline number of messages returned by MED-Project within predetermined timeframe.</p> | <p>On an ongoing basis, MED-Project may revise and/or add communications materials based on changes to the Plan.</p> <p>MED-Project will evaluate media and public outreach, collect feedback by survey, and receive County feedback, in order to make adjustments and improvements to the Program. The survey will be conducted in accordance with requirements in the Ordinance and Regulations. Results of the survey will be published on the MED-Project Website established under Section XI.D.2.</p> |
| <b>Collector Outreach</b>              | <p>Contact potential collectors and invite them to participate in the Program.</p>   | <p>Ongoing communication with Kiosk Drop-Off Sites.</p> <p>Evaluation of Kiosk Drop-Off Sites against the Service Convenience Requirement.</p>  |

## VII. Patient Privacy

Instructions at each Kiosk Drop-Off Site will inform people who deposit Unwanted Medicine that they should completely cross out, remove, or otherwise make unreadable any and all personally identifiable information on the drug containers and packaging before depositing them into the kiosk. In cases where people follow the instructions, there will be no readable personally identifiable information.

In addition to kiosk signage, all MED-Project instructional, promotional, and educational materials encourage Residents to protect their information by ensuring that personally identifiable information is not present when utilizing Mail-Back Services or depositing Unwanted Medicine into kiosks.

Vendor has additional protections available for keeping personally identifiable information safe and secure. Service Technicians are trained in managing items containing sensitive patient information. Privacy training

is part of a Service Technician's prerequisite for field services. As added protection, containers, packages, and envelopes used for Mail-Back Services will be opaque rather than clear. In addition, inner liners used at Kiosk Drop-Off Sites will be opaque rather than clear, in compliance with the DEA Rule. This will prevent anyone, including the Service Technician, from seeing any information on the containers placed into the kiosks. Materials to help Residents cross out any personally identifiable information will also be available at any Take-Back Events.

## VIII. Call Center

Per Ordinance § B11-547(a)(4), MED-Project will operate a Call Center jointly with all other approved stewardship programs operating in the County. Questions from Residents will be managed by a Call Center with the support of operators available that speak the Required Languages. All operators are trained to respond based on the requirements set by MED-Project.

Operators may answer general questions, including questions on the following topics:

1. Items that can be disposed of;
2. Disposal options;
3. Direction to the MED-Project Website for additional information; and
4. Information about available Mail-Back Services.

Because the list of Kiosk Drop-Off Sites and Mail-Back Distribution Locations is subject to change, Residents will be directed to the MED-Project Website or to an operator for detailed information about locations and contact information.

## IX. Training

Operational procedures, including training, are the responsibility of the Kiosk Drop-Off Site. MED-Project will support training, if agreed to with the Kiosk Drop-Off Site Host. Additionally, MED-Project will manage a Help Desk to answer questions and monitor comments for participating Kiosk Drop-Off Sites and Mail-Back Distribution Locations.

The Help Desk will support two general communication functions:

1. Answer questions and monitor comments from participating Kiosk Drop-Off Site Hosts and Mail-Back Distribution Locations; and
2. Support and direct service requests from participating Kiosk Drop-Off Sites and Mail-Back Distribution Locations.

Messages received from Kiosk Drop-Off Sites and Mail-Back Distribution Locations will be returned within one business day. A call log summary for Kiosk Drop-Off Sites and Mail-Back Distribution Locations will be maintained. Details can be provided upon request within 90 days of Plan approval.

Vendor will comply with all applicable laws, regulations, and other legal requirements. The internal training process of Vendor that supports Technician-Assisted Collection Kiosk Drop-Off Sites, Take-Back Events, and Standard Mail-Back Services will address the following:

- Onboarding & on-truck observation of job functions;
- DOT Training;
- DEA Training;
- United States Environmental Protection Agency (“EPA”) Waste Characterization;
- Occupational Safety and Health Administration (“OSHA”) Training;
- Waste Handling Demo;
- Truck Operation;
- DEA Handling Demo;
- Health Insurance Portability and Accountability Act (“HIPAA”) requirements;
- OSHA Bloodborne Pathogens Standard;
- Review & Written Test; and
- Perform work under supervision to demonstrate proficiency prior to certification to service client accounts.

#### **A. Service Technician Training**

The Service Technicians collecting and packaging the Unwanted Medicine for transport from Technician-Assisted Collection Kiosk Drop-Off Sites will complete comprehensive training. This training includes instruction on:

- DOT hazardous materials requirements;
- EPA waste characterization requirements;
- Resource Conservation and Recovery Act (“RCRA”) hazardous waste requirements;
- DEA controlled substances transfer protocols;
- OSHA requirements; and
- HIPAA requirements.

Service Technicians must complete a 24- or 40-hour Hazardous Waste Operations and Emergency Response Standard (“HAZWOPER”) course. Additionally, Service Technicians must complete annual refresher training that includes an 8-hour training on DOT, HAZWOPER, HIPAA, OSHA, RCRA, and safety and security training. Finally, Service Technicians receive ongoing training through meetings and online refresher courses. Vendor employees servicing Technician-Assisted Collection Kiosk Drop-Off Sites and/or Standard Mail-Back Services will have a training base similar to that of Service Technicians, with customized training as needed.

## X. Vendor, Transporter, and Disposal Facility Information

### Technician-Assisted Collection Kiosk Drop-Off Site and Take-Back Event Collection Services

#### A. Vendor for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

- Name: **Stericycle Specialty Waste Solutions, Inc.** (“Stericycle”) will service Technician-Assisted Collection Kiosk Drop-Off Sites. Stericycle may also service Take-Back Events.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericycleeenvironmental.com](http://www.stericycleeenvironmental.com)
- Type: DEA Registered Collector
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

#### B. Carrier for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

- Name: **United Parcel Service, Inc.** will transport Unwanted Medicine from Technician-Assisted Collection Kiosk Drop-Off Sites to the Stericycle, Inc., Indianapolis, Indiana Facility or the Stericycle, Inc., Warren, Ohio Facility. United Parcel Service, Inc. may also transport Unwanted Medicine from Take-Back Events to the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 55 Glenlake Parkway NE, Atlanta, GA 30328
- Phone: (800) PICK-UPS
- Website: [www.UPS.com/](http://www.UPS.com/)
- Type: Common Carrier
- U.S. Small Package DOT No: 21800, Status: Issued
- U.S. Freight DOT No: 121058, Status: Issued
- Penalty Record (5 years): For enforcement history, UPS advises that “all material government investigation and enforcement activity is provided in our SEC filings at [investors.ups.com](http://investors.ups.com)”

#### C. Reverse Distributor Facility & Transporters for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

##### 1. Reverse Distributor Facility

- Name: **Stericycle, Inc., Indianapolis, Indiana Facility** will receive Unwanted Medicine from United Parcel Service, Inc.
- Address: 2670 Executive Drive, Suite A, Indianapolis, IN 46241-9901
- Phone: (317) 275-7530
- Website: [www.stericycleeenvironmental.com](http://www.stericycleeenvironmental.com)
- Type: DEA Registered Collector and Reverse Distributor & Permitted Hazardous Waste (RCRA) Treatment, Storage, and/or Disposal Facility
- DEA Registration No: RS0331607, Status: Issued
- EPA ID No: INR000110197, Status: Issued
- TSDF (RCRA) Permit No: INR000110197, Status: Issued
- Solid Waste Processing Facility Permit No: FP 49-57, Status: Issued
- Air Quality Permit No: E097-28740-00671, Status: Issued
- Penalty Record (5 years): *See Appendix I.A*

## 2. Transporter 1

- Name: **Heritage Transport** will transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Heritage Thermal Services – Ohio.
- Address: 1626 Research Way, Indianapolis, IN 46231
- Phone: (317) 486-2973
- Website: <http://www.heritage-enviro.com/>
- Type: Hazardous Waste Transporter
- EPA ID No: IND 058 484 114, Status: Issued
- US DOT No: 314460, Status: Issued
- Penalty Record (5 years): None

## 3. Transporter 2

- Name: **Veolia – Port Arthur** may be used to transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Veolia – Port Arthur.
- Address: 7665 Texas Highway 73, Beaumont, TX 77705
- Phone: (409) 736-2821
- Website: [www.veolianorthamerica.com](http://www.veolianorthamerica.com)
- Type: Hazardous Waste Transporter
- Penalty Record (5 years): *See Appendix I.B*

## 4. Transporter 3

- Name: **Stericycle Specialty Waste Solutions, Inc.** may transport Unwanted Medicine from the Stericycle, Inc., Indianapolis, Indiana Facility to Veolia-Port Arthur, Clean Harbors – Aragonite, and/or Stericycle, Inc., Warren, Ohio Facility.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericycleenvironmental.com](http://www.stericycleenvironmental.com)
- Type: Hazardous Waste Transporter
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

## D. Disposal Facilities for Technician-Assisted Collection Kiosk Drop-Off Sites and Take-Back Events

### 1. Disposal Facility 1

- Name: **Heritage Thermal Services – Ohio** will incinerate Unwanted Medicine received from the Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 1250 Saint George Street, East Liverpool, OH 43920
- Phone: (800) 545-7655
- Website: <http://www.heritage-thermal.com/>
- Type: Permitted Hazardous Waste Incinerator
- DEA Registration No: RH0387628, Status: Issued
- RCRA Permit No: OHD980613541, Status: Issued
- EPA ID No: OHD 980 613 541, Status: Issued
- Ohio ID No: 02-15-0589, Status: Issued
- Penalty Record (5 years): *See Appendix I.C*

## 2. Disposal Facility 2

- Name: **Veolia – Port Arthur** may incinerate Unwanted Medicine that cannot be processed by Heritage Thermal Services - Ohio.
- Address: 7665 Texas Highway 73, Beaumont, TX 77705
- Phone: (409) 736-2821
- Website: [www.veolianorthamerica.com](http://www.veolianorthamerica.com)
- Type: Permitted Hazardous Waste Incinerator
- EPA ID No: TXD000838896, Status: Issued
- State Title V Permit No: O-01509, Status: Issued
- Air Permit No: NSR Air, Status: Issued
- Water Permit No: TPDES02417, Status: Issued
- TSDf (RCRA) Permit No: HW-50212, Status: Issued
- Penalty Record (5 years): *See Appendix I.B*

## 3. Disposal Facility 3

- Name: **Stericycle, Inc., Warren, Ohio Facility** may incinerate Unwanted Medicine received from United Parcel Service, Inc. and/or Stericycle, Inc., Indianapolis, Indiana Facility.
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: <https://www.stericycle.com/service-locations/ohio/warren>
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

## 4. Disposal Facility 4

- Name: **Clean Harbors - Aragonite** will incinerate Unwanted Medicine that cannot be processed by Heritage Thermal Services – Ohio, Veolia – Port Arthur, and/or the Stericycle, Inc., Warren, Ohio Facility.
- Addresses: 3 Miles E 7 Miles N of Knolls, Wendover, UT 84083
- Phone: (435) 884-8900
- Website: [www.cleanharbors.com](http://www.cleanharbors.com)
- Type: Permitted Hazardous Waste Incinerator
- US EPA ID No: UTD981552177, Status: Issued
- TSDf (RCRA) Permit No: UTD981552177, Status: Issued
- State Title V Permit No: 4500048002, Status: Issued
- Air Permit No: DAQE-168-02, Status: Issued
- Penalty Record (5 years): *See Appendix I.D*

## Standard Mail-Back Services

### E. Vendors for Standard Mail-Back Packages

#### 1. Vendor 1

- Name: **Stericycle Specialty Waste Solutions, Inc.** may provide Standard Mail-Back Packages.
- Address: 2850 100th Court NE Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericleenvironmental.com](http://www.stericleenvironmental.com)
- Type: DEA Registered Collector
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

#### 2. Vendor 2

- Name: **Covanta Environmental Solutions, LLC** may provide Standard Mail-Back Packages.
- Address: 7326 E. Evans Road Suite B, Scottsdale, AZ 85620
- Phone: (855) 269-1750
- Website: [www.covantaes.com](http://www.covantaes.com)
- Type: DEA Registered Collector
- DEA Registration No: RC0518160, Status: Issued
- Penalty Record (5 years): None

### F. Carrier of Standard Mail-Back Packages

- Name: **United States Postal Service** may ship Standard Mail-Back Packages to the Stericycle, Inc., Warren, Ohio Facility.<sup>6</sup> United States Postal Service may also ship Standard Mail-Back Packages to the Covanta Environmental Solutions LLC, Manheim, PA Facility.
- Address: 475 L'Enfant Plaza SW, Washington, DC 20260
- Phone: (202) 268-2000
- Website: [www.USPS.com/](http://www.USPS.com/)
- Type: Common Carrier
- Penalty Record (5 years): For enforcement history, see [USPS SEC filings](#)

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<sup>6</sup> Standard Mail-Back Packages distributed before Vendor moved the destruction of MED-Project Standard Mail-Back Packages to the Stericycle, Inc., Warren, Ohio Facility are addressed to the Stericycle, Inc., Indianapolis, Indiana Facility identified in Plan Section X.C.1 and delivered there by the United States Postal Service. Any such Standard Mail-Back Packages that Residents return will be forwarded by United Parcel Service, Inc. from the Stericycle, Inc., Indianapolis, Indiana Facility to the Stericycle, Inc., Warren, Ohio Facility for incineration. See 21 CFR § 1317.70(e).

## G. Reverse Distributor Facilities and Transporter for Standard Mail-Back Packages

### 1. Reverse Distributor Facility 1

- Name: **Stericycle, Inc. Warren, Ohio** will receive Standard Mail-Back Packages from Stericycle Specialty Waste Solutions, Inc. via United States Postal Service and certain forwarded packages via United Parcel Service, Inc. *See* 21 CFR § 1317.70(e)
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: <https://www.stericycle.com/service-locations/ohio/warren>
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

### 2. Reverse Distributor Facility 2

- Name: **CES Manheim, Pennsylvania Facility** will receive Standard Mail-Back Packages from Covanta Environmental Solutions, LLC from United States Postal Service.
- Address: 190 Shellyland Road, Manheim, PA 17545
- Phone: (717) 653-8882
- Website: [www.covantaes.com](http://www.covantaes.com)
- Type: DEA Registered Collector and Reverse Distributor
- DEA Registration No: RC0322595, Status: Issued
- Special Permit No: DOT-SP 20255
- Penalty Record (5 years): None

### 3. Transporter

- Name: **Doncin Transport, Inc.** will transport Standard Mail-Back Packages from the CES Manheim, Pennsylvania Facility to Covanta Lancaster and/or Covanta York.
- Address: 3478 Sunnyside Rd., Manheim, PA 17545
- Phone: (602) 344-4536
- Website: <http://www.truckdrivingcdljobs.com/in/Pennsylvania/Manheim/DONCIN%20TRANSPORT%20INC.php>
- Type: Contract Carrier
- US DOT Number: 001625457 Status: Issued
- Penalty Record (5 years): None

## H. Disposal Facilities for Standard Mail-Back Packages

### 1. Disposal Facility 1

- Name: **Stericycle, Inc. Warren, Ohio** will incinerate Standard Mail-Back Packages from United States Postal Service and certain forwarded packages via United Parcel Service, Inc. See 21 CFR § 1317.70(e).
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: [www.stericycle.com/service-locations/ohio/warren](http://www.stericycle.com/service-locations/ohio/warren)
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

### 2. Disposal Facility 2

- Name: **Covanta Lancaster** will incinerate Standard Mail-Back Packages from the CES Manheim, Pennsylvania Facility.
- Address: 1911 River Road, Bainbridge, PA 17502
- Phone: (717) 397-9968
- Website: [www.covanta.com](http://www.covanta.com)
- Type: Municipal Solid Waste Combustor
- Solid Waste Permit: 400592 PaDEP, Status: Issued
- Title V Operating Permit: 36-05013, Status: Issued
- US EPA ID No: CAD982520066, Status: Issued
- Penalty Record (5 years): None

### 3. Disposal Facility 3

- Name: **Covanta York** will incinerate Standard Mail-Back Packages from the CES Manheim, Pennsylvania Facility.
- Address: 2651 Blackbridge Road, York, PA 17406
- Phone: (717) 843-2902
- Website: [www.covanta.com](http://www.covanta.com)
- Type: Municipal Solid Waste Combustor
- Solid Waste Permit: 400561 PaDEP, Status: Issued
- Title V Operating Permit: 67-05006, Status: Issued
- Penalty Record (5 years): None

## Injector Mail-Back Services

### I. Vendor for Injector Mail-Back Packages

- Name: **PureWay Compliance Inc.** will provide Injector Mail-Back Packages.
- Address: 20501 Katy Freeway, Suite 206, Katy, TX 77450
- Phone: (877) 765-3030
- Website: <http://pureway.com/>
- Type: Vendor
- Penalty Record (5 years): None

## J. Carrier of Injector Mail-Back Packages

- Name: **United States Postal Service** will transport Injector Mail-Back Packages to Daniels Sharpsmart, Inc. United States Postal Service may also transport Injector Mail-Back Packages to Curtis Bay Energy, LP Baltimore, Maryland.
- Address: 475 L'Enfant Plaza SW, Washington, DC 20260
- Phone: (202) 268-2000
- Website: [www.USPS.com/](http://www.USPS.com/)
- Type: Common Carrier
- Penalty Record (5 years): For enforcement history, see [USPS SEC filings](#)

## K. Transfer Facility for Injector Mail-Back Packages

- Name: **Daniels Sharpsmart Inc.** will receive Injector Mail-Back Packages and provide for transport to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 4144 East Therese Avenue, Fresno, CA 93725
- Phone: (559) 834-6252
- Website: <http://danielsinternational.com/>
- Type: Medical Waste Treatment Facility
- Medical Waste Permit No: TS-OST-55, Status: Issued
- CA EPA ID No: CAL000344393; Status: Issued
- US DOT No: 1295076, Status: Issued
- Penalty Record (5 years): See [Appendix I.E](#)

## L. Transporter(s) for Injector Mail-Back Packages

### 1. Transporter 1

- Name: **Lula Logistics Inc.** will transport Injector Mail-Back Packages received from Daniels Sharpsmart, Inc. Fresno, California Transfer Facility to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 8268 Nelson Ridge Ln, Las Vegas, NV 89178
- Phone: (352) 346-6219
- E-mail: [lulalogistics@yahoo.com](mailto:lulalogistics@yahoo.com)
- Type: Contract Carrier
- US DOT No: 2335002, Status: Issued
- Penalty Record (5 years): None

### 2. Transporter 2

- Name: **GPB Logistics Inc.** will transport Injector Mail-Back Packages received from the Daniels Sharpsmart, Inc. Fresno, California Transfer Facility to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 2115 W Farwell Ave #103, Chicago, IL 60645
- Phone: (773) 968-7210
- Website: [www.gpblogistics.com](http://www.gpblogistics.com)
- Type: Contract Carrier
- US DOT No: 2783871, Status: Issued
- Penalty Record (5 years): None

## M. Disposal Facilities for Injector Mail-Back Packages

### 1. Disposal Facility 1

- Name: **Covanta Huntsville, Inc.** will incinerate Injector Mail-Back Packages received from Daniels Sharpsmart, Inc.
- Address: 5251 Triana Blvd SW, Huntsville, AL 35805
- Phone: (256) 882-1019
- Website: <https://www.covanta.com/Our-Facilities/Covanta-Huntsville>
- Type: Municipal Waste Combustor
- Title V Air Permit No: 709-1104, Status: Issued
- US EPA ID No: AL0000266726, Status: Issued
- Penalty Record (5 years): None

### 2. Disposal Facility 2

- Name: **Covanta Marion, Inc.** will incinerate Injector Mail-Back Packages received from Daniels Sharpsmart, Inc.
- Address: 4850 Brook Lake Rd. NE, Brooks, OR 97305
- Phone: (503) 393-0890
- Website: <https://www.covanta.com/Our-Facilities/Covanta-marion>
- Type: Municipal Waste Combustor
- Conditionally Exempt Small Quantity Generator: ORD987179470, Status: Issued
- Title V Air Permit No: 24-5398-TV-01, Status: Issued
- NPDES Permit No: 1200-Z, Status: Issued
- Solid Waste Permit No: 364, Status: Issued
- Penalty Record (5 years): None

### 3. Disposal Facility 3

- Name: **Curtis Bay Energy, LP** will incinerate Injector Mail-Back Packages received from United States Postal Service.
- Address: 3200 Hawkins Point Road, Baltimore, MD 21226
- Phone: 855) 228-1715
- Website: [www.curtisbayenergy.com](http://www.curtisbayenergy.com)
- Type: Permitted Medical Waste Incinerator
- Title V Air Permit No: 24-510-02975, Status: Issued
- Maryland Department of the Environment Refuse Disposal Permit No: 2017-WMI-0036, Status: Issued
- US EPA ID No: MDD985404318, Status: Issued
- Penalty Record (5 years) *See [Appendix I.F](#)*

## Inhaler Mail-Back Services

### N. Vendors for Inhaler Mail-Back Packages

#### 1. Vendor 1

- Name: **PureWay Compliance Inc.** may provide Inhaler Mail-Back Packages.
- Address: 20501 Katy Freeway, Suite 206, Katy, TX 77450
- Phone: (877) 765-3030
- Website: <http://pureway.com/>
- Type: Vendor
- Penalty Record (5 years): None

#### 2. Vendor 2

- Name: **Stericycle Specialty Waste Solutions, Inc.** may provide Inhaler Mail-Back Packages.
- Address: 2850 100th Court NE, Blaine, MN 55449
- Phone: (612) 285-9865
- Website: [www.stericycleeenvironmental.com](http://www.stericycleeenvironmental.com)
- Type: Vendor
- US DOT No: 1348411, Status: Issued
- DOT ID No: MNS 000 110 924, Status: Issued
- Penalty Record (5 years): None

### O. Carriers for Inhaler Mail-Back Packages

#### 1. Carrier 1

- Name: **United Parcel Service, Inc.** will transport Inhaler Mail-Back Packages provided by PureWay Compliance Inc. to Daniels SharpSmart, Inc. Fresno, California Transfer Facility.
- Address: 55 Glenlake Parkway NE, Atlanta, GA 30328
- Phone: (800) PICK-UPS
- Website: [www.UPS.com/](http://www.UPS.com/)
- Type: Common Carrier
- U.S. Small Package DOT No: 21800, Status: Issued
- U.S. Freight DOT No: 121058, Status: Issued
- Penalty Record (5 years): For enforcement history, UPS advises that “all material government investigation and enforcement activity is provided in our SEC filings at [investors.ups.com](http://investors.ups.com)”

#### 2. Carrier 2

- Name: **United States Postal Service** will transport Inhaler Mail-Back Packages provided by Stericycle to the Stericycle, Inc. Warren, Ohio Facility.
- Address: 475 L'Enfant Plaza, S.W. Washington, DC 20260
- Phone: (202) 268-2000
- Website: [www.USPS.com/](http://www.USPS.com/)
- Type: Common Carrier
- Penalty Record (5 years): For enforcement history, see [USPS SEC filings](#)

## P. Transfer Facility for Inhaler Mail-Back Packages

- Name: **Daniels Sharpsmart Inc.** will receive Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and provide for transport to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 4144 East Therese Avenue, Fresno, CA 93725
- Phone: (559) 834-6252
- Website: <http://danielsinternational.com/>
- Type: Medical Waste Treatment Facility
- Medical Waste Permit No: TS-OST-55, Status: Issued
- CA EPA ID No: CAL000344393; Status: Issued
- US DOT No: 1295076, Status: Issued
- Penalty Record (5 years): *See Appendix I.F*

## Q. Transporter(s) for Inhaler Mail-Back Packages

### 1. Transporter 1

- Name: **Lula Logistics Inc.** will transport Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from the Daniels Sharpsmart, Inc. Fresno, California Transfer Facility to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 8268 Nelson Ridge Ln, Las Vegas, NV 89178
- Phone: (352) 346-6219
- E-mail: [lulalogistics@yahoo.com](mailto:lulalogistics@yahoo.com)
- Type: Contract Carrier
- US DOT No: 2335002, Status: Issued
- Penalty Record (5 years): None

### 2. Transporter 2

- Name: **GPB Logistics Inc.** will transport Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from the Daniels Sharpsmart, Inc. Fresno, California Transfer Facility to the Covanta Huntsville, Inc. or Covanta Marion, Inc. Municipal Waste Combustors.
- Address: 2115 W Farwell Ave #103, Chicago, IL 60645
- Phone: (773) 968-7210
- Website: [www.gpblogistics.com](http://www.gpblogistics.com)
- Type: Contract Carrier
- US DOT No: 2783871, Status: Issued
- Penalty Record (5 years): None

## R. Disposal Facilities for Inhaler Mail-Back Packages

### 1. Disposal Facility 1

- Name: **Covanta Huntsville, Inc.** will incinerate Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from Daniels Sharpsmart, Inc.
- Address: 5251 Triana Blvd SW, Huntsville, AL 35805
- Phone: (256) 882-1019
- Website: <https://www.covanta.com/Our-Facilities/Covanta-Huntsville>
- Type: Municipal Waste Combustor
- Title V Air Permit No: 709-1104, Status: Issued
- US EPA ID No: AL0000266726, Status: Issued
- Penalty Record (5 years): None

## 2. Disposal Facility 2

- Name: **Covanta Marion, Inc.** will incinerate Inhaler Mail-Back Packages provided by PureWay Compliance Inc. and received from Daniels Sharpsmart, Inc.
- Address: 4850 Brook Lake Rd. NE, Brooks, OR 97305
- Phone: (503) 393-0890
- Website: <https://www.covanta.com/Our-Facilities/Covanta-marion>
- Type: Municipal Waste Combustor
- Conditionally Exempt Small Quantity Generator: ORD987179470, Status: Issued
- Title V Air Permit No: 24-5398-TV-01, Status: Issued
- NPDES Permit No: 1200-Z, Status: Issued
- Solid Waste Permit No: 364, Status: Issued
- Penalty Record (5 years): None

## 3. Disposal Facility 3

- Name: **Stericycle, Inc. Warren, Ohio** will incinerate Inhaler Mail-Back Packages provided by Stericycle and received from the United States Postal Service.
- Address: 1901 Pine Avenue, S.E., Warren, OH 44483
- Phone: (330) 393-0370
- Website: [www.stericycle.com/service-locations/ohio/warren](http://www.stericycle.com/service-locations/ohio/warren)
- Type: Medical Waste Incinerator
- DEA Registration No: RS0498130, Status: Issued
- Solid Waste Operating Permit No: CID 41805, Status: Issued
- Final Air Pollution Control Title V Permit No: P0115341, Status: Issued
- Penalty Record (5 years): None

# XI. Unwanted Medicine Educational & Outreach Programming

## A. Overview

As required by Ordinance § B11-547, MED-Project will seek to coordinate with other approved stewardship programs to develop a single system of promotion if other approved stewardship plans are operating in the County.

## B. Audiences

To effectively educate the public about the Plan, MED-Project will develop a comprehensive communications campaign featuring both broad communications tactics as well as targeted outreach to audiences directly involved in the distribution of medicines to Residents. These audiences may include:

- Residents;
- Pharmacies and Retailers of Covered Drugs;
- Health care providers and their patients;
- Veterinary providers and animal owners;
- Public health facilities; and/or
- LEAs.

This Program will include efforts to reach the varied cultural, linguistic, geographic, and age demographics, including through outreach to ethnic, community, and alternate-language media; outreach to community organizations serving a broad range of audiences; availability in the Required Languages (Section XI.D.1); and availability of educational information through a broad range of media platforms.

## C. Messages

MED-Project anticipates that messaging will:

- Educate Residents about the appropriate use, storage, and disposal of Unwanted Medicine;
- Educate Residents about Mail-Back Services available;
- Provide Residents with information about available Kiosk Drop-Off Sites and Mail-Back Distribution Locations in their area that offer disposal of Unwanted Medicine; and,
- Provide Residents information about available methods of proper disposal of Pre-filled Injector Products through Mail-Back Services. *See Appendix F.*

Key points of emphasis might include:

- The importance of taking medicines as prescribed by your health care provider;
- The importance of adhering to and completing your provider-prescribed therapy;
- The importance of properly and securely storing medicines;
- The importance of promptly and properly disposing of Unwanted Medicine;
- How to find and use Kiosk Drop-Off Sites;
- How to properly use the Mail-Back Services provided;
- How to properly dispose of Unwanted Medicine; and/or,
- Privacy issues (removing personally identifiable information from labeled prescription containers).

At least one of the key points listed above will be included in outreach materials such as brochures, print ads, social media posts, etc. Samples of materials and the specific messages can be seen in [Appendices E, J, K, and L](#).

## D. Tools/Communications Channels

The Program will include several components designed to reach Residents and provide consistent access to timely and relevant information. Distribution of materials will likely include audiences such as pharmacies, health care providers and systems, health associations, local government agencies, and other community organizations. MED-Project expects that the tools and communication channels will include:

### 1. Phone

MED-Project will provide a Call Center for Residents to obtain information about Kiosk Drop-Off Sites and Mail-Back Distribution Locations, educational materials, and other aspects of the Program for the take-back of Unwanted Medicine from Residents. The Call Center will provide:

- Operator support in the Required Languages.
- Basic information about how the Program works, where to obtain more information (*e.g.*, the MED-Project Website), and an option to talk with an operator to find a Kiosk Drop-Off Site in the Resident's zip code or local area or to obtain information about Mail-Back Services.
- Information about locations of drop-off sites, collection events, and distribution sites for mail-back services available to Residents that are provided by other organizations in the County. This aggregated information will be updated at least annually using information available to the public.
- Information directing Residents with medical emergencies to call 911 and directing Residents with medication-related questions to contact their health care provider(s).
- Text telephone services for Residents who are hearing impaired.

Please *see* [Appendix J](#) for a sample call script.

## 2. MED-Project Website

MED-Project will develop a mobile-friendly MED-Project Website with translations available in the Required Languages. MED-Project expects information available to users will include pages to help Residents find locations of Kiosk Drop-Off Sites and Mail-Back Distribution Locations, as well as educational materials, frequently asked questions and responses, and information regarding available Mail-Back Services. When changes occur, the MED-Project Website will be updated within 5 to 10 business days of the change to ensure the most current information is available.

- The Plan includes sample web pages for the MED-Project Website. [Appendix K](#) provides a proof of concept example for a possible MED-Project Website.
- The MED-Project Website will also include access to a public relations toolkit in a downloadable format (*see* Section XI.D.3) and contact information for Residents. A toolkit could include items such as a flyer/brochure, Mail-Back Package inserts (*see* [Appendix L](#), for an example), and a frequently asked questions (FAQ) document. Translations of the brochure and FAQ will be available in the Required Languages.
- Community and government organizations and other public interest groups seeking materials to promote the Program will be encouraged to access these resources.

MED-Project will provide information on the MED-Project Website about locations of drop-off sites, collection events, and distribution sites for mail-back services available to Residents that are provided by other organizations in the County. This aggregated information will provide Residents with a single, convenient resource for finding disposal options by zip code. MED-Project will update the “aggregator” portion of the website at least annually using information available to the public.

## 3. Materials

Educational materials about the Program and how to properly dispose of Unwanted Medicine and Pre-filled Injector Products will be available through the MED-Project Website, through potential third-party partners, community organizations, and at Kiosk Drop-Off Sites. Upon request, MED-Project will provide Kiosk Drop-Off Sites signage (*see* [Appendix E](#)) and/or other printed materials (*see* [Appendix L](#)) specifying the availability of Mail-Back Services for Pre-filled Injector Products as described in Section F.

The Plan includes a sample of the informational and educational brochure ([Appendix L](#)). Educational materials will use plain language and explanatory images to promote consumer education and collection options to Residents with limited English proficiency and will be translated into the Required Languages.

## 4. Media Outreach

MED-Project expects that the Program will conduct public outreach through mediums such as traditional and social media, posting of educational signage, and at community events. Outreach efforts will encourage media outlets and third-party groups to download and use the toolkit. The following materials will support the Unwanted Medicine educational and outreach programming:

- *See* [Appendix J](#) for a sample call script with the toolkit including flyers in [Appendix L](#) and the sample MED-Project Website information included in [Appendix K](#).
- *See* [Appendix M](#) for a sample list of key media outlets.
- *See* [Appendix N](#) for a sample list of social media outlets.

## E. Collaboration with County Officials and Community Organizations

MED-Project expects that the Program will work in collaboration with the County, as appropriate, to build on existing community outreach resources, such as local organizations, media lists, available public media outlets, etc.

The Program will perform the following activities:

- *Briefing Materials Provided to Support Coordination with County Officials:*
  - MED-Project will provide access to educational and outreach materials, including the sample brochure (see [Appendix L](#)), to relevant departments and officials. For a detailed marketing plan, please see [Appendix O](#).
- *Outreach through Community Organizations:*
  - MED-Project will engage relevant stakeholders and community organizations by providing selected community organizations identified in [Appendix B](#) with the toolkit included in [Appendix L](#).
- *Briefing Materials Provided to Support collaboration with home health care providers.*
  - MED-Project will collaborate with home health care providers to promote the use of Mail-Back Services by disabled and home-bound Residents. MED-Project will be providing home health care providers with the toolkit included in [Appendix L](#).

## F. Disclaimer

The written and verbal educational materials and public outreach tools that are required by the Ordinance and disseminated under this Plan will include a disclaimer similar to the following: “This material has been provided for the purposes of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.”

## XII. Survey

Per Ordinance § B11-547(c), MED-Project will conduct a biennial survey of Residents, pharmacists, veterinarians, and health care professionals who interact with members of the community, according to requirements established in the Ordinance and Regulations.

The biennial survey will be conducted in the Required Languages.

## XIII. Packaging

The Ordinance requires that a Plan consider “[s]eparating covered drugs from packaging to the extent possible to reduce transportation and disposal costs; and [r]ecycling of Drug packaging to the extent feasible.” Ordinance § B11-542(h).

MED-Project has considered and evaluated options for the separation and recycling of drug packaging. Separating and recycling drug packaging collected under the Plan would require the management of separate waste streams at Kiosk Drop-Off Sites and Take-Back Events, including a waste stream for drug packaging and a waste stream for the drugs themselves.

While drug packaging is expected to constitute a significant amount of the waste incinerated under the Plan, MED-Project has concluded that separation of inner and/or outer packaging from Unwanted Medicine and/or recycling would raise three significant concerns:

1. Separating and recycling drug packaging could result in the disclosure of confidential patient information appearing on prescription drug packaging;
2. Separating and recycling drug packaging could increase the potential for releases and leakage of Unwanted Medicine; and
3. Separating and recycling drug packaging could increase diversion risk by adding additional steps to the collection process and, because drug packaging is often used in drug counterfeiting, could be a diversion target itself.

For these reasons, the Plan does not provide for the separation and recycling of packaging from Unwanted Medicine.

MED-Project education and outreach materials instruct Residents to return Unwanted Medicine at a Kiosk Drop-Off Site or via Mail-Back Services, in its original container or in a sealed bag. These materials encourage Residents who transfer their Unwanted Medicine into a sealed bag to recycle all remaining packaging.

## **XIV. Compliance with Applicable Laws, Regulations, and Other Legal Requirements**

The Ordinance requires that a Plan describe how all entities participating in the Program will “operate under” all applicable laws, regulations, and other legal requirements. Ordinance § B11-542(d). As described in more detail below, the Plan is designed such that all entities participating in the Program shall comply with all applicable laws, regulations, and other legal requirements.

### **A. DEA Controlled Substances Act and Implementing Regulations**

On October 12, 2010, the United States Congress enacted the Secure and Responsible Drug Disposal Act of 2010 (“Disposal Act”) as amendments to the Controlled Substances Act (“CSA”). The Disposal Act amended the CSA to allow for the expansion of entities to which users can deliver pharmaceutical controlled substances for disposal, subject to regulations to be promulgated. On September 9, 2014, the DEA adopted a rule entitled “Disposal of Controlled Substances” to implement the Disposal Act.

Under the DEA Rule, collection of controlled substances is limited to Schedule II, III, IV, or V controlled substances that are lawfully possessed by an ultimate user or person entitled to dispose of an ultimate user decedent’s property. *See* DEA Rule §§ 1317.75(b) (Kiosk Drop-Off Sites)<sup>7</sup>; 1317.65(d) (Take-Back Events); 1317.70(b) (Standard Mail-Back Services). Schedule I controlled substances, controlled substances that are not lawfully possessed as described above, and other illicit or dangerous substances will not be collected. Additionally, as these provisions of the DEA Rule limit collection of controlled substances to those lawfully possessed by an ultimate user or certain other persons, pharmacies are prohibited from disposing their own inventory or stock through the Program. *See* also § 1317.05.

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<sup>7</sup> For Kiosk Drop-Off Site collection, only certain substances “that are lawfully possessed by an ultimate user or other authorized non-registrant person may be collected.” §1317.75(b). This language is similar to, but slightly different than, provisions limiting collection at Take-Back Events and through Standard Mail-Back Services to ultimate users or other persons (lawfully) entitled to dispose of an ultimate user decedent’s property. *See* §§ 1317.65(d); 1317.70(b).

The DEA Rule provides that LEAs can continue to accept controlled substances for disposal. However, the DEA Rule also provides that pharmacies, reverse distributors, hospitals/clinics with on-site pharmacies, and certain other entities, can register with the DEA as “collectors” and become authorized at their discretion on a voluntary basis to accept controlled substances. The DEA Rule:

- Provides for the collection of controlled substances at Kiosk Drop-Off Sites at LEAs, pharmacies, and hospitals or clinics with on-site pharmacies;
- Provides for collection of controlled substances at Take-Back Events;
- Provides for the use of mail-back programs to collect controlled substances;
- Allows for the commingling of controlled and non-controlled substances;
- Establishes detailed collection, recordkeeping, security, and other measures for all approved collection methods; and
- Provides that all collected pharmaceutical products be destroyed so that the products are rendered non-retrievable.

The Plan is designed such that all entities that are part of the Program, including Vendor, are individually responsible to comply with their respective compliance obligations under the DEA Rule. Vendor will ensure that the collection, transportation, and disposal of Unwanted Medicine collected from Kiosk Drop-Off Sites and Standard Mail-Back Services, and Take-Back Events; including controlled substances, complies with all DEA requirements, including those in § 1317.

Controlled substances collected pursuant to the Plan may be commingled with non-controlled substances at Kiosk Drop-Off Sites and Take-Back Events, and through Standard Mail-Back Services per the DEA Rule. *See* §§ 1317.75(b) (Kiosk Drop-Off Sites); 1317.65(d) (Take-Back Events); 1317.70(b) (Standard Mail-Back Services).

## **1. DEA Registration Modification**

Pursuant to DEA Rule. § 1301.51(b), pharmacies may modify their registrations to become authorized collectors by submitting a written request to the DEA or online at [www.DEAdiversion.usdoj.gov](http://www.DEAdiversion.usdoj.gov). This request must contain:

- The registrant’s name, address, and registration number (as printed on the registration certificate);
- The collection methods the registrant intends to conduct; and
- A signature in accordance with § 1301.13(j).

*See* § 1301.51(b). MED-Project will consult with participating pharmacies, as requested, regarding how to modify DEA registrations to become authorized collectors.

## **B. United States Department of Transportation (DOT)**

When preparing Unwanted Medicine for transport and transporting Unwanted Medicine, Vendor will ensure compliance with the DOT HMR.

### C. California State Board of Pharmacy

On June 8, 2017, the Board of Pharmacy adopted the Board of Pharmacy Regulations, Article 9.1 of Division 17 of Title 16 of the California Code of Regulations. Largely based on the DEA Rule, the Board of Pharmacy Regulations establish requirements applicable to pharmacies, hospitals/clinics with on-site pharmacies, distributors, and reverse distributors conducting certain drug take-back services. Among other things, the Board of Pharmacy Regulations provide:

- That California-licensed pharmacies and hospitals/clinics with on-site pharmacies must be in good standing with, and notify, the Board of Pharmacy to host a drug kiosk. *See* 16 CCR §§ 1776, 1776.1(i).
- That pharmacies must “know and adhere” to all applicable “federal, state, and local requirements governing the collection and destruction of dangerous drugs” when operating a drug take-back program. *See* 16 CCR § 1776.1(b).
- Drug kiosk placement and monitoring requirements. *See* 16 CCR §§ 1776.3(b)-(d).
- Drug kiosk inner liner, container, and signage requirements. *See* 16 CCR §§ 1776.3(f), (h), (m).
- Inner liner handling, storage, and destruction requirements for drug kiosks. *See, e.g.*, 16 CCR §§ 1776.3(h)-(j), 1776.5(a)-(c).
- Pharmacy and reverse distributor recordkeeping requirements. *See* 16 CCR §§ 1776.5(e)-(f), 1776.6.
- Pharmacy drug mail-back program requirements. *See* 16 CCR § 1776.2.

The Plan is designed such that all entities that are part of the Plan, including Vendor, are individually responsible for complying with their respective compliance obligations under the Board of Pharmacy Regulations.

## XV. Annual Report

An annual report will be provided to the Director within six months after the end of the first twelve-month period of operation and annually thereafter. Ordinance § B11-548(a). The annual report’s content and administration shall satisfy requirements established in the Ordinance and Regulations, inclusive of the components of Section 8 (A) and Section 8 (B) of Safe Drug Disposal Regulations adopted on March 20, 2017 by the County of Santa Clara.

# Appendix A

## MED-Project Participants

The list of participating Producers in MED-Project's Program in the County is provided to the County on a routine basis to satisfy Ordinance requirements. The below list is a subset of the information provided as of October 12, 2018.

| Parent Company                 | Company Name                             | Address                             | City          | ST | Zip   | Country |
|--------------------------------|--|-------------------------------------|---------------|----|-------|---------|
| 3M Corporation                 | 3M Drug Delivery Systems                 | 3M Center 275-5W-06                 | Saint Paul    | MN | 55144 | USA     |
| 3M Corporation                 | 3M Drug Delivery Systems                 | 3M Center, 275-3E-02                | St. Paul      | MN | 55144 | USA     |
| 3M Corporation                 | 3M ESPE                                  | 3M Center 275-5W-06                 | Saint Paul    | MN | 55144 | USA     |
| 3M Corporation                 | 3M Health Care                           | 3M Center 275-5W-06                 | Saint Paul    | MN | 55144 | USA     |
| 3M Corporation                 | 3M Personal Care                         | 3M Center 275-5W-06                 | Saint Paul    | MN | 55144 | USA     |
| AbbVie Inc.                    | AbbVie Inc.                              | 1 North Waukegan Road               | North Chicago | IL | 60064 | USA     |
| AbbVie Inc.                    | Pharmacyclics, subsidiary of AbbVie Inc. | 999 East Arques Avenue              | Sunnyvale     | CA | 94085 | USA     |
| ACADIA Pharmaceuticals Inc.    | ACADIA Pharmaceuticals Inc.              | 3611 Valley Centre Drive, Suite 300 | San Diego     | CA | 92130 | USA     |
| Accord Healthcare Inc.         | Accord Healthcare Inc.                   | 1009 Slater Road, Suite 210-B       | Durham        | NC | 27703 | USA     |
| Acorda Therapeutics, Inc.      | Acorda Therapeutics, Inc.                | 420 Saw Mill River Road             | Ardsley       | NY | 10502 | USA     |
| Acorda Therapeutics, Inc.      | Acorda Therapeutics, Inc.                | 420 Saw Mill River Road             | Ardsley       | NY | 10502 | USA     |
| Acorda Therapeutics, Inc.      | Civitas Therapeutics, Inc.               | 420 Saw Mill River Road             | Ardsley       | NY | 10502 | USA     |
| Aegerion Pharmaceuticals, Inc. | Aegerion Pharmaceuticals, Inc.           | One Main Street, Ste. 800           | Cambridge     | MA | 02142 | USA     |
| Afaxys Inc.                    | Afaxys Inc.                              | PO Box 20639                        | Charleston    | SC | 29413 | USA     |

| Parent Company               | Company Name   | Address   | City        | ST | Zip   | Country |
|------------------------------|--|---|-------------|----|-------|---------|
| Afaxys Inc.                  | Afaxys Pharmaceuticals (a division of Afaxys Inc.)         | PO Box 20639                                      | Charleston  | SC | 29413 | USA     |
| Akorn, Inc.                  | Akorn, Inc.  | 1925 West Field Court, Suite 300                  | Lake Forest | IL | 60045 | USA     |
| Akorn, Inc.                  | Advanced Vision Research Inc. d.b.a. Akorn Consumer Health | C/O Akorn, Inc., 1925 West Field Court, Suite 300 | Lake Forest | IL | 60045 | USA     |
| Akorn, Inc.                  | Akorn Animal Health, Inc.                                  | C/O Akorn, Inc, 1925 West Field Court, Suite 300  | Lake Forest | IL | 60045 | USA     |
| Akorn, Inc.                  | Clover Pharmaceuticals Corp.                               | C/O Akorn, Inc., 1925 West Field Court, Suite 300 | Lake Forest | IL | 60045 | USA     |
| Akorn, Inc.                  | Hi-Tech Pharmacal Co., Inc.                                | 369 Bayview Avenue                                | Amityville  | NY | 11701 | USA     |
| Akorn, Inc.                  | Oak Pharmaceuticals, Inc.                                  | C/O Akorn, Inc., 1925 West Field Court, Suite 300 | Lake Forest | IL | 60045 | USA     |
| Akorn, Inc.                  | Olta Pharmaceuticals Corp.                                 | C/O Akorn, Inc., 1925 West Field Court Suite 300  | Lake Forest | IL | 60045 | USA     |
| Akorn, Inc.                  | Versapharm, Incorporated                                   | C/O Akorn, Inc., 1925 West Field Court, Suite 300 | Lake Forest | IL | 60045 | USA     |
| Akrimax Pharmaceuticals, LLC | Akrimax Pharmaceuticals, LLC                               | 11 Commerce Drive, First Floor                    | Cranford    | NJ | 07016 | USA     |
| AKRON COATING & ADHESIVES    | AKRON COATING & ADHESIVES                                  | 367 Stanton Ave                                   | Akron       | OH | 44301 | USA     |

| Parent Company                             | Company Name  | Address  | City                     | ST | Zip   | Country |
|--|---|--|--------------------------|----|-------|---------|
| <b>Alembic Pharmaceuticals Inc.</b>        | Alembic Pharmaceuticals                                 | 750 Highway 202, Suite 410   | Bridgewater              | NJ | 08807 | USA     |
| <b>Allergan, Inc.</b>                      | Allergan, Inc.  | 2525 Dupont Dr   | Irvine                   | CA | 92612 | USA     |
| <b>Allergan, Inc.</b>                      | Actavis Pharma, Inc. (only for labeler code 52544)      | 400 Interpace Pkwy Bldg A  | Parsippany               | NJ | 07054 | USA     |
| <b>Allergan, Inc.</b>                      | Allergan Sales, LLC                                     | 5 Giralda Farms  | Madison                  | NJ | 07940 | USA     |
| <b>Allergan, Inc.</b>                      | Allergan USA, Inc.                                      | 5 Giralda Farms  | Madison                  | NJ | 07940 | USA     |
| <b>Allergan, Inc.</b>                      | Aptalis Pharma US, Inc.                                 | 5 Giralda Farms  | Madison                  | NJ | 07940 | USA     |
| <b>Allergan, Inc.</b>                      | Durata Therapeutics US Limited                          | c/o Durata Therapeutics, Inc.,<br>200 S. Wacker Drive, Suite<br>2550 | Chicago                  | IL | 60606 | USA     |
| <b>Allergan, Inc.</b>                      | Forest Laboratories, LLC                                | Corporation Trust Centre, 1209<br>Orange St                          | Wilmington New<br>Castle | DE | 19801 | USA     |
| <b>Allergan, Inc.</b>                      | Pacific Pharma, Inc.                                    | 5 Giralda Farms  | Madison                  | NJ | 07940 | USA     |
| <b>Allergan, Inc.</b>                      | Warner Chilcott (US), LLC                               | 5 Giralda Farms  | Madison                  | NJ | 07940 | USA     |
| <b>Allergan, Inc.</b>                      | Watson Laboratories, Inc. (only for labeler code 52544) | 400 Interpace Pkwy Bldg A  | Parsippany               | NJ | 07054 | USA     |
| <b>Alva-Amco Pharmacal Companies, Inc.</b> | Alva-Amco Pharmacal Companies, Inc.                     | 7711 N Merrimac Avenue   | Niles                    | IL | 60714 | USA     |
| <b>Alvogen Pharma US, Inc.</b>             | Alvogen Pharma US, Inc.                                 | 10 Bloomfield Ave  | Pine Brook               | NJ | 07058 | USA     |

| Parent Company  | Company Name  | Address                        | City          | ST | Zip   | Country |
|---|---|--------------------------------|---------------|----|-------|---------|
| Alvogen Pharma US, Inc.   | Almatica Pharma, Inc.   | 10 Bloomfield Ave              | Pine Brook    | NJ | 07058 | USA     |
| Alvogen Pharma US, Inc.   | Alvogen, Inc.   | 10 Bloomfield Ave              | Pine Brook    | NJ | 07058 | USA     |
| Alvogen Pharma US, Inc.   | County Line Pharmaceuticals LLC                                 | 10 Bloomfield Ave              | Pine Brook    | NJ | 07058 | USA     |
| Alvogen Pharma US, Inc.   | Norwich Pharmaceuticals, Inc.                                   | 6829 State Highway 12          | Norwich       | NY | 13815 | USA     |
| AMAG Pharmaceuticals, Inc.                                      | AMAG Pharmaceuticals, Inc.                                      | 1100 Winter Street             | Waltham       | MA | 02451 | USA     |
| AMAG Pharmaceuticals, Inc.                                      | AMAG Pharma USA, Inc.   | 1100 Winter Street, Suite 3000 | Waltham       | MA | 02451 | USA     |
| Amarin Pharma, Inc.   | Amarin Pharma, Inc.   | 1430 Rt. 206                   | Bedminster    | NJ | 07921 | USA     |
| Amarin Pharma, Inc.   | Amarin Corp   | 1430 Rt. 206                   | Bedminster    | NJ | 07921 | USA     |
| Amarin Pharma, Inc.   | Amarin Corp. PLC  | 1430 Rt. 206                   | Bedminster    | NJ | 07921 | USA     |
| Amarin Pharma, Inc.   | Amarin Pharmaceuticals Ireland Ltd.                             | 1430 Route 206                 | Bedminster    | NJ | 07921 | USA     |
| Amerisource Health Services, LLC DBA: American Health Packaging | Amerisource Health Services, LLC DBA: American Health Packaging | 2550-A John Glenn Avenue       | Columbus      | OH | 43217 | USA     |
| Amgen Inc.  | Amgen Inc.  | One Amgen Center Drive         | Thousand Oaks | CA | 91320 | USA     |
| Amgen Inc.  | Amgen USA   | One Amgen Center Drive         | Thousand Oaks | CA | 91320 | USA     |
| Amgen Inc.  | Immunex Corporation   | One Amgen Center Drive         | Thousand Oaks | CA | 91320 | USA     |

| Parent Company                  | Company Name  | Address   | City                | ST              | Zip   | Country                   |
|---------------------------------|---|---|---------------------|-----------------|-------|---------------------------|
| Amgen Inc.                      | Onyx Pharmaceuticals                                  | 249 N. Grand Avenue                               | South San Francisco | CA              | 94080 | USA                       |
| Amneal Pharmaceuticals LLC      | Amneal Pharmaceuticals LLC                            | 400 Crossing Blvd Third Floor                     | Bridgewater         | NJ              | 08807 | USA                       |
| Amneal Pharmaceuticals LLC      | Amedra Laboratories LLC                               | 2 Walnut Grove Drive                              | Horsham             | PA              | 19044 | USA                       |
| Amneal Pharmaceuticals LLC      | CorePharma, LLC                                       | 215 Wood Avenue                                   | Middlesex           | NJ              | 08846 | USA                       |
| Amneal Pharmaceuticals LLC      | Gemini Laboratories, LLC                              | Graymark at Bridgewater, 1200 US Highway 22 Ste 3 | Bridgewater         | NJ              | 08807 | USA                       |
| Amneal Pharmaceuticals LLC      | Impax Laboratories (Taiwan), Inc. Jhunan Science Park | No.1, Ke Dong 3rd Road 350                        | Jhunan              | MiaoLing County |       | Taiwan, Province of China |
| Amneal Pharmaceuticals LLC      | Impax Laboratories, Inc.                              | 602 Office Center Drive                           | Fort Washington     | PA              | 19034 | USA                       |
| Amneal Pharmaceuticals LLC      | Lineage Therapeutics Inc.                             | 2 Walnut Grove                                    | Horsham             | PA              | 19044 | USA                       |
| Amphastar Pharmaceuticals, Inc. | Amphastar Pharmaceuticals, Inc.                       | 11570 Sixth Street                                | Rancho Cucamonga    | CA              | 91730 | USA                       |
| Amphastar Pharmaceuticals, Inc. | International Medication Systems, LTD                 | 1886 Santa Anita Ave                              | South El Monte      | CA              | 91733 | USA                       |
| Amring Pharmaceuticals Inc.     | Amring Pharmaceuticals Inc.                           | 1235 Westlakes Drive, Suite 205                   | Berwyn              | PA              | 19312 | USA                       |
| Apotex Holdings, Inc.           | ApoPharma USA, Inc.                                   | 2400 N. Commerce Parkway, Suite 400               | Weston              | FL              | 33326 | USA                       |

| Parent Company                           | Company Name                             | Address                             | City         | ST | Zip   | Country |
|--|--|-------------------------------------|--------------|----|-------|---------|
| Apotex Holdings, Inc.                    | Apotex Corp.                             | 2400 N. Commerce Parkway, Suite 400 | Weston       | FL | 33326 | USA     |
| Apotex Holdings, Inc.                    | Aveva Drug Delivery Systems, Inc.        | 2400 N. Commerce Parkway, Suite 400 | Weston       | FL | 33326 | USA     |
| Aptevo BioTherapeutics LLC               | Aptevo BioTherapeutics LLC               | 920 Cassatt Road                    | Berwyn       | PA | 19312 | USA     |
| Aqua Pharmaceuticals an Almirall Company | Aqua Pharmaceuticals an Almirall Company | 707 Eagleview Blvd., Suite 200      | Exton        | PA | 19341 | USA     |
| Arbor Pharmaceuticals, Inc.              | Arbor Pharmaceuticals, Inc.              | 6 Concourse Parkway, Suite 1800     | Atlanta      | GA | 30328 | USA     |
| Arbor Pharmaceuticals, Inc.              | Wilshire Pharmaceuticals                 | 6 Concourse Parkway, Suite 1800     | Atlanta      | GA | 30328 | USA     |
| Ascend Therapeutics US, LLC              | Ascend Therapeutics US, LLC              | 607 Herndon Parkway, Suite 110      | Herndon      | VA | 20170 | USA     |
| Astellas Pharma US, Inc.                 | Astellas Pharma US, Inc.                 | 1 Astellas Way                      | Northbrook   | IL | 60062 | USA     |
| AstraZeneca Pharmaceuticals LP           | AstraZeneca Pharmaceuticals LP           | 1800 Concord Pike, PO Box 15437     | Wilmington   | DE | 19850 | USA     |
| AstraZeneca Pharmaceuticals LP           | AstraZeneca Pharmaceuticals LP           | 1800 Concord Pike, PO Box 15437     | Wilmington   | DE | 19850 | USA     |
| Aurobindo Pharma USA, Inc                | Aurobindo Pharma USA, Inc                | 279 Princeton Hightstown Road       | East Windsor | NJ | 08520 | USA     |
| Aurobindo Pharma USA, Inc                | Aurobindo Pharma Limited                 | 6 Wheeling Road                     | Dayton       | NJ | 08810 | USA     |

| Parent Company                | Company Name                          | Address                       | City      | ST | Zip   | Country |
|-------------------------------|---------------------------------------|-------------------------------|-----------|----|-------|---------|
| Aurobindo Pharma USA, Inc     | Aurobindo Pharma USA Incorporated     | 6 Wheeling Road               | Dayton    | NJ | 08810 | USA     |
| Aurobindo Pharma USA, Inc     | AuroHealth, LLC                       | 6 Wheeling Road               | Dayton    | NJ | 08810 | USA     |
| Aurobindo Pharma USA, Inc     | AuroLife Pharma LLC                   | 2400 Rt 130                   | Dayton    | NJ | 08810 | USA     |
| Aurobindo Pharma USA, Inc     | AuroMedics Pharma, LLC                | 6 Wheeling Road               | Dayton    | NJ | 08810 | USA     |
| B.F. Ascher & Co., Inc.       | B.F. Ascher & Co., Inc.               | 15501 W. 109th St.            | Lenexa    | KS | 66219 | USA     |
| Baxter Healthcare Corporation | Baxter Healthcare Corporation         | One Baxter Parkway            | Deerfield | IL | 60015 | USA     |
| Bayer HealthCare LLC          | Bayer HealthCare LLC                  | 100 Bayer Boulevard           | Whippany  | NJ | 07981 | USA     |
| Bayer HealthCare LLC          | Bayer Consumer Care Holdings LLC      | 100 Bayer Blvd                | Whippany  | NJ | 07981 | USA     |
| Bayer HealthCare LLC          | Bayer HealthCare Animal Health Inc.   | 12707 Shawnee Mission Parkway | Shawnee   | KS | 66216 | USA     |
| Bayer HealthCare LLC          | Bayer HealthCare Pharmaceuticals Inc. | 100 Bayer Blvd                | Whippany  | NJ | 07981 | USA     |
| Bayer HealthCare LLC          | Bayer HealthCare Pharmaceuticals LLC  | 800 Dwight Way                | Berkeley  | CA | 94710 | USA     |
| Bayer HealthCare LLC          | MSD Consumer Care Inc.                | 100 Bayer Boulevard           | Whippany  | NJ | 07981 | USA     |
| Beach Products, Inc.          | Pharmaceutical Associates, Inc.       | 3010 W de Leon St             | Tampa     | FL | 33609 | USA     |

| Parent Company                 | Company Name                                | Address                        | City        | ST | Zip   | Country |
|--------------------------------|---|--------------------------------|-------------|----|-------|---------|
| Beach Products, Inc.           | Beach Pharmaceuticals                       | 3010 W. De Leon Street         | Tampa       | FL | 33609 | USA     |
| Beach Products, Inc.           | Pharmaceutical Associates, Inc.             | 3010 W. De Leon Street         | Tampa       | FL | 33609 | USA     |
| BestCo, Inc.                   | BestCo, Inc.                                | 288 Mazeppa Road               | Mooresville | NC | 28027 | USA     |
| Biogen Inc.                    | Biogen Inc.                                 | 225 Binney Street              | Cambridge   | MA | 02142 | USA     |
| BioMarin Pharmaceutical Inc.   | BioMarin Pharmaceutical                     | 105 Digital Drive              | Novato      | CA | 94949 | USA     |
| Bionpharma Inc.                | Bionpharma Inc.                             | 600 Alexander Road, Suite 2-4B | Princeton   | NJ | 08540 | USA     |
| Bionpharma Inc.                | Banner Life Sciences LLC                    | 600 Alexander Rd Ste 2-4B      | Princeton   | NJ | 08540 | USA     |
| Blistex Inc.                   | Blistex Inc.                                | 1800 Swift Drive               | Oak Brook   | IL | 60523 | USA     |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim USA, Inc.              | 900 Ridgebury Road             | Ridgefield  | CT | 06877 | USA     |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Animal Health Division | 3239 Satellite Blvd            | Duluth      | GA | 30096 | USA     |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Fremont, Inc.          | 6701 Kaiser Drive              | Fremont     | CA | 94555 | USA     |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Pharmaceuticals, Inc.  | 900 Ridgebury Road             | Ridgefield  | CT | 06877 | USA     |
| Boehringer Ingelheim USA, Inc. | Boehringer Ingelheim Vetmedica, Inc.        | 2612 Belt Highway              | St. Joseph  | MO | 64506 | USA     |

| Parent Company                 | Company Name  | Address                                      | City       | ST | Zip   | Country |
|--------------------------------|---|--|------------|----|-------|---------|
| Boehringer Ingelheim USA, Inc. | Merial Barceloneta, LLC   | 900 Ridgebury Road                           | Ridgefield | CT | 06877 | USA     |
| Boehringer Ingelheim USA, Inc. | Merial Select, Inc.   | 3239 Satellite Blvd                          | Duluth     | GA | 30096 | USA     |
| Boehringer Ingelheim USA, Inc. | Merial, Inc.  | 3239 Satellite Blvd                          | Duluth     | GA | 30096 | USA     |
| Boehringer Ingelheim USA, Inc. | Newport Laboratories, Inc.                                      | 900 Ridgebury Road                           | Ridgefield | CT | 06877 | USA     |
| Braintree Laboratories Inc.    | Sebela Pharmaceuticals Inc.                                     | 60 Columbian Street West,<br>P.O. Box 850929 | Braintree  | MA | 02185 | USA     |
| Bristol-Myers Squibb Company   | Bristol-Myers Squibb Company                                    | P.O. Box 4500                                | Princeton  | NJ | 08543 | USA     |
| Bristol-Myers Squibb Company   | Bristol-Myers Squibb Sanofi Pharmaceuticals Holding Partnership | Route 206 & Province Line Road               | Princeton  | NJ | 08540 | USA     |
| Bristol-Myers Squibb Company   | E.R. Squibb & Sons, LLC   | P.O. Box 4500                                | Princeton  | NJ | 08543 | USA     |
| Bristol-Myers Squibb Company   | Medarex, LLC  | 707 State Road                               | Princeton  | NJ | 08540 | USA     |
| Bristol-Myers Squibb Company   | ZymoGenetics, Inc.  | 1201 Eastlake Ave E                          | Seattle    | WA | 98102 | USA     |
| Celgene Corporation            | Celgene Corporation   | 86 Morris Avenue                             | Summit     | NJ | 07901 | USA     |

| Parent Company  | Company Name   | Address                            | City       | ST          | Zip     | Country  |
|---|--|------------------------------------|------------|-------------|---------|----------|
| <b>Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.)</b> | Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.) | 1255 Crescent Green Drive, Ste 250 | Cary       | NC          | 27518   | USA      |
| <b>Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.)</b> | Aristos Pharmaceuticals, Inc.                              | 1255 Crescent Green Drive, Ste 250 | Cary       | NC          | 27518   | USA      |
| <b>Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.)</b> | Chiesi USA   | 1255 Crescent Green Drive, Ste 250 | Cary       | NC          | 27518   | USA      |
| <b>Chiesi USA, Inc. (formerly Cornerstone Therapeutics, Inc.)</b> | Cornerstone Therapeutics Inc.                              | 1255 Crescent Green Drive, Ste 250 | Cary       | NC          | 27518   | USA      |
| <b>Church &amp; Dwight Company, Inc.</b>                          | Church & Dwight Company, Inc.                              | 469 N Harrison St                  | Princeton  | NJ          | 08540   | USA      |
| <b>Clarion Brands LLC</b>   | Clarion Brands LLC   | 27070 Miles Road, Suite A          | Solon      | OH          | 44139   | USA      |
| <b>Clovis Oncology, Inc.</b>                                      | Clovis Oncology, Inc.                                      | 5500 Flatiron Parkway              | Boulder    | CO          | 80301   | USA      |
| <b>Colgate-Palmolive Company</b>                                  | Colgate-Palmolive Company                                  | 300 Park Avenue                    | New York   | NY          | 10022   | USA      |
| <b>Colgate-Palmolive Company</b>                                  | Colgate Oral Pharmaceuticals, Inc.                         | 300 Park Avenue                    | New York   | NY          | 10022   | USA      |
| <b>Concordia Pharmaceuticals Inc.</b>                             | Concordia Pharmaceuticals Inc.                             | 5 Canewood Industrial Park         | Canewood   | St. Michael | BB11005 | Barbados |
| <b>Corcept Therapeutics</b>                                       | Corcept Therapeutics                                       | 149 Commonwealth Drive             | Menlo Park | CA          | 94025   | USA      |

| Parent Company                           | Company Name                             | Address                      | City            | ST | Zip   | Country |
|--|--|------------------------------|-----------------|----|-------|---------|
| CSL Behring, LLC                         | CSL Behring, LLC                         | 1020 1st Ave MB 435-10       | King of Prussia | PA | 19406 | USA     |
| CutisPharma, Inc.                        | CutisPharma, Inc.                        | 841 Woburn Street            | Wilmington      | MA | 01887 | USA     |
| Daichi Sankyo, Inc.                      | Daiichi Sankyo, Inc.                     | 211 Mt. Airy Rd.             | Basking Ridge   | NJ | 07920 | USA     |
| Daichi Sankyo, Inc.                      | American Regent, Inc.                    | One Luitpold Drive           | Shirley         | NY | 11967 | USA     |
| Daichi Sankyo, Inc.                      | Luitpold Pharmaceuticals, Inc.           | One Luitpold Drive           | Shirley         | NY | 11967 | USA     |
| Davion Inc.                              | Davion Inc.                              | 2 Progress Road              | North Brunswick | NJ | 08902 | USA     |
| Dechra Veterinary Products North America | Dechra Veterinary Products North America | 7015 College Blvd, Ste 525   | Leawood         | KS | 66211 | USA     |
| Dechra Veterinary Products North America | Putney, Inc.                             | 7015 College Blvd, Unit 525  | Overland Park   | KS | 66211 | USA     |
| Depomed, Inc.                            | Depomed, Inc.                            | 7999 Gateway Blvd, Suite 300 | Newark          | CA | 94560 | USA     |
| Dr. Reddy's Laboratories, Inc            | Dr. Reddy's Laboratories, Inc            | 107 College Road East        | Princeton       | NJ | 08540 | USA     |
| Dr. Reddy's Laboratories, Inc            | Dr. Reddy's Laboratories Louisiana, LLC  | 107 College Road East        | Princeton       | NJ | 08540 | USA     |
| Dr. Reddy's Laboratories, Inc            | Dr. Reddy's Laboratories Tennessee, LLC  | 107 College Road East        | Princeton       | NJ | 08540 | USA     |
| Dr. Reddy's Laboratories, Inc            | Promius Pharma, LLC                      | 107 College Road East        | Princeton       | NJ | 08540 | USA     |

| Parent Company                | Company Name  | Address                                   | City            | ST     | Zip     | Country |
|-------------------------------|---|---|-----------------|--------|---------|---------|
| DSE Healthcare Solutions, LLC | DSE Healthcare Solutions, LLC                           | 105 Fieldcrest Avenue, Suite 502A         | Edison          | NJ     | 08837   | USA     |
| DSE Healthcare Solutions, LLC | Numark Brands, Inc.                                     | 105 Fieldcrest Avenue, Suite 502A         | Edison          | NJ     | 08837   | USA     |
| Duchesnay USA, Inc.           | Duchesnay USA, Inc.                                     | 919 Conestoga Road, Building I, Suite 203 | Rosemont        | PA     | 19010   | USA     |
| Duchesnay USA, Inc.           | Analog Pharma, Inc.                                     | 919 Conestoga Road, Building I, Suite 203 | Rosemont        | PA     | 19010   | USA     |
| Duchesnay USA, Inc.           | Duchesnay Inc.  | 950 Boulevard Michele-Bohec               | Blainville      | Quebec | J7C 5E2 | Canada  |
| Duchesnay USA, Inc.           | Medunik USA, Inc.                                       | 919 Conestoga Road, Building I, Suite 203 | Rosemont        | PA     | 19010   | USA     |
| Eisai, Inc.                   | Eisai, Inc.   | 100 Tice Blvd                             | Wood Cliff Lake | NJ     | 07677   | USA     |
| Eli Lilly and Company         | Eli Lilly and Company                                   | Lilly Corporate Center                    | Indianapolis    | IN     | 46285   | USA     |
| Eli Lilly and Company         | Elanco Animal Health                                    | 2500 Innovation Way N                     | Greenfield      | IN     | 46140   | USA     |
| EMD Serono, Inc.              | EMD Serono, Inc.  | One Technology Place                      | Rockland        | MA     | 02370   | USA     |
| Endo Pharmaceuticals Inc.     | Endo Pharmaceuticals Inc.                               | 1400 Atwater Drive                        | Malvern         | PA     | 19355   | USA     |
| Endo Pharmaceuticals Inc.     | Anchen Pharmaceuticals, Inc. (d/b/a Par Pharmaceutical) | 9601 Jeronimo Road                        | Irvine          | CA     | 92618   | USA     |
| Endo Pharmaceuticals Inc.     | Auxilium Pharmaceuticals, Inc.                          | 640 Lee Road                              | Chesterbrook    | PA     | 19087   | USA     |

| Parent Company            | Company Name   | Address                   | City           | ST | Zip   | Country |
|---------------------------|--|---------------------------|----------------|----|-------|---------|
| Endo Pharmaceuticals Inc. | BOCA Pharmacals, Inc.  | 130 Vintage Drive         | Huntsville     | AL | 35811 | USA     |
| Endo Pharmaceuticals Inc. | DAVA Pharmaceuticals, Inc.                                       | 130 Vintage Drive         | Huntsville     | AL | 35811 | USA     |
| Endo Pharmaceuticals Inc. | Generics Bidco I, LLC (d/b/a Par Pharmaceutical)                 | 130 Vintage Drive         | Huntsville     | AL | 35811 | USA     |
| Endo Pharmaceuticals Inc. | Generics Bidco II, LLC (d/b/a Par Pharmaceutical)                | 3241 & 3700 Woodpark Blvd | Charlotte      | NC | 28206 | USA     |
| Endo Pharmaceuticals Inc. | Innoteq, Inc. (d/b/a Par Pharmaceutical)                         | 555 Lordship Blvd.        | Stratford      | CT | 06615 | USA     |
| Endo Pharmaceuticals Inc. | Par Pharmaceutical Companies, Inc.                               | One Ram Ridge Rd          | Chestnut Ridge | NY | 10977 | USA     |
| Endo Pharmaceuticals Inc. | Par Pharmaceutical, Inc.   | 300 Tice Boulevard        | Woodcliff Lake | NJ | 07677 | USA     |
| Endo Pharmaceuticals Inc. | Par Pharmaceuticals, Inc. (d/b/a Par Pharmaceutical)             | One Ram Ridge Rd          | Chestnut Ridge | NY | 10977 | USA     |
| Endo Pharmaceuticals Inc. | Par Sterile Products, LLC (d/b/a Par Pharmaceutical)             | 970 Parkdale Road         | Rochester      | MI | 48307 | USA     |
| Endo Pharmaceuticals Inc. | Quartz Specialty Pharmaceuticals, LLC (d/b/a Par Pharmaceutical) | 130 Vintage Drive         | Huntsville     | AL | 35811 | USA     |
| Endo Pharmaceuticals Inc. | Vintage Pharmaceuticals, Inc. (d/b/a Par Pharmaceutical)         | 130 Vintage Ave           | Huntsville     | AL | 35811 | USA     |

| Parent Company                      | Company Name   | Address                 | City                | ST | Zip   | Country |
|-------------------------------------|--|-------------------------|---------------------|----|-------|---------|
| Endo Pharmaceuticals Inc.           | Vintage Pharmaceuticals, LLC<br>(d/b/a Par Pharmaceutical) | 120 Vintage Drive       | Huntsville          | AL | 35811 | USA     |
| Endo Pharmaceuticals Inc.           | Vintage Pharmaceuticals, LLC<br>(d/b/a Par Pharmaceutical) | 150 Vintage Drive       | Huntsville          | AL | 35811 | USA     |
| Exelixis, Inc.                      | Exelixis, Inc.   | 1851 Harbor Bay Parkway | Alameda             | CA | 94502 | USA     |
| Exelixis, Inc.                      | Exelixis US, LLC   | 210 E Grand Ave         | South San Francisco | CA | 94080 | USA     |
| Ferring Pharmaceuticals Inc.        | Ferring Pharmaceuticals Inc.                               | 100 Interpace Parkway   | Parsippany          | NJ | 07054 | USA     |
| Foundation Consumer Healthcare, LLC | Foundation Consumer Healthcare, LLC                        | 1190 Omega Drive        | Pittsburgh          | PA | 15205 | USA     |
| Fresenius Kabi USA, LLC             | Fresenius Kabi USA, LLC                                    | Three Corporate Drive   | Lake Zurich         | IL | 60047 | USA     |
| G&W Laboratories, Inc.              | G&W Laboratories, Inc.                                     | 111 Coolidge Street     | South Plainfield    | NJ | 07080 | USA     |
| G&W Laboratories, Inc.              | G&W NC Laboratories LLC                                    | 1877 Kawai Rd           | Lincolnton          | NC | 28092 | USA     |
| G&W Laboratories, Inc.              | G&W PA Laboratories LLC                                    | 650 Cathill Rd          | Sellersville        | PA | 18960 | USA     |
| Galderma Laboratories, L.P.         | Galderma Laboratories, L.P.                                | 14501 North Freeway     | Fort Worth          | TX | 76177 | USA     |
| Garcoa Laboratories, Inc.           | Garcoa Laboratories  | 26135 Mureau Road       | Calabasas           | CA | 91302 | USA     |
| Genus Lifesciences Inc.             | Genus Lifesciences Inc.                                    | 514 North 12th Street   | Allentown           | PA | 18102 | USA     |
| Gilead Sciences, Inc.               | Gilead Sciences, Inc.                                      | 333 Lakeside Drive      | Foster City         | CA | 94404 | USA     |

| Parent Company                             | Company Name                           | Address                                     | City                   | ST        | Zip   | Country |
|--|--|---|------------------------|-----------|-------|---------|
| Gilead Sciences, Inc.                      | Gilead Sciences Limited                | 333 Lakeside Drive                          | Foster City            | CA        | 94404 | USA     |
| Gilead Sciences, Inc.                      | Gilead Sciences, Inc.                  | 333 Lakeside Drive                          | Foster City            | CA        | 94404 | USA     |
| Gilead Sciences, Inc.                      | Gilead Sciences, LLC                   | 333 Lakeside Drive                          | Foster City            | CA        | 94404 | USA     |
| GlaxoSmithKline, LLC                       | GlaxoSmithKline, LLC                   | 5 Crescent Drive                            | Philadelphia           | PA        | 19112 | USA     |
| GlaxoSmithKline, LLC                       | GlaxoSmithKline Consumer Healthcare LP | 184 Liberty Corner Road                     | Warren                 | NJ        | 07059 | USA     |
| GlaxoSmithKline, LLC                       | GlaxoSmithKline Holdings (US) LLC      | 5 Crescent Drive                            | Philadelphia           | PA        | 19112 | USA     |
| GlaxoSmithKline, LLC                       | Novartis Consumer Health, Inc.         | 200 Kimball Drive                           | Parsippany             | NJ        | 07054 | USA     |
| GlaxoSmithKline, LLC                       | Stiefel Laboratories, Inc.             | 20 TW Alexander Dr, PO Box 14910            | Research Triangle Park | NC        | 27709 | USA     |
| Glenmark Pharmaceuticals Inc., USA         | Glenmark Pharmaceuticals Inc., USA     | 750 Corporate Drive                         | Mahwah                 | NJ        | 07430 | USA     |
| Grifols Shared Services North America Inc. | Grifols Biologicals LLC                | 5555 Valley Blvd.                           | Los Angeles            | CA        | 90032 | USA     |
| Grifols Shared Services North America Inc. | Grifols Therapeutics LLC               | 8368 US 70 Business Hwy West                | Clayton                | NC        | 27520 | USA     |
| Grifols Shared Services North America Inc. | Instituto Grifols S.A.                 | Poligono Industrial Levante, C Can Guasc, 2 | Parets Del Valles      | Barcelona | 08150 | Spain   |

| Parent Company                             | Company Name                        | Address                                  | City              | ST        | Zip     | Country        |
|--|-------------------------------------|--|-------------------|-----------|---------|----------------|
| Grifols Shared Services North America Inc. | Laboratorios Grifols S.A.           | Calle Logistica 2, Poligono Industrial Z | Parets del Valles | Barcelona | 08150   | Spain          |
| Grifols Shared Services North America Inc. | Talecris Biotherapeutics, Inc.      | 2410 Lillyvale Avenue                    | Los Angeles       | CA        | 90032   | USA            |
| Harris Pharmaceutical, Inc.                | Harris Pharmaceutical, Inc.         | 9090 Park Royal Drive                    | Ft. Myers         | FL        | 33908   | USA            |
| Hikma Pharmaceuticals, PLC                 | Hikma Pharmaceuticals, PLC          | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Algeria                       | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Algeria - Manufacturing Plant | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Asia Pacific                  | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Austria                       | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Bahrain                       | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Belgium                       | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC                 | Hikma Egypt - 6th October           | 1 New Burlington Place, Mayfair          | London            |           | W1S 2HR | United Kingdom |

| Parent Company             | Company Name  | Address                                       | City                 | ST | Zip     | Country        |
|----------------------------|---|---|----------------------|----|---------|----------------|
| Hikma Pharmaceuticals, PLC | Hikma Egypt - Badr City                               | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Egypt - Beni Suef                               | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Egypt - Head Office                             | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Germany - Hikma Pharma GmbH                     | Hikma Pharma GmbH,<br>Lochhamer StrBe 13      | 82152<br>Martinsried |    |         | Germany        |
| Hikma Pharmaceuticals, PLC | Hikma Germany - Thymoorgan                            | Thymoorgan Pharmazie<br>GmbH, Schiffgraben 23 | D-38690 Goslar       |    |         | Germany        |
| Hikma Pharmaceuticals, PLC | Hikma Italy   | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Jordan - Arabic Medical Containers LLC          | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Jordan - Headquarters                           | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Jordan - International Pharma. Research Ctr LLC | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Jordan - Jordan Souq                            | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Jordan - Salt                                   | 1 New Burlington Place,<br>Mayfair            | London               |    | W1S 2HR | United Kingdom |

| Parent Company             | Company Name  | Address                            | City        | ST | Zip     | Country        |
|----------------------------|---|------------------------------------|-------------|----|---------|----------------|
| Hikma Pharmaceuticals, PLC | Hikma Kuwait  | 1 New Burlington Place,<br>Mayfair | London      |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Lebanon   | 1 New Burlington Place,<br>Mayfair | London      |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma MENA Building   | 1 New Burlington Place,<br>Mayfair | London      |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Morocco   | 1 New Burlington Place,<br>Mayfair | London      |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Oman  | 1 New Burlington Place,<br>Mayfair | London      |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Pharmaceutcals USA,<br>Inc.—Non-Injectables<br>Manufacturing Facility | 1809 Wilson Rd                     | Columbus    | OH | 43228   | USA            |
| Hikma Pharmaceuticals, PLC | Hikma Pharmaceuticals USA,<br>Inc. Headquarters                             | 246 Industrial Way W               | Eatontown   | NJ | 07724   | USA            |
| Hikma Pharmaceuticals, PLC | Hikma Pharmaceuticals USA,<br>Inc.—Distribution Warehouse                   | 4750 Pleasant Hill Rd              | Memphis     | TN | 38118   | USA            |
| Hikma Pharmaceuticals, PLC | Hikma Pharmaceuticals USA,<br>Inc.—Injectable Manufacturing<br>Facility     | 2 Esterbrook Lane                  | Cherry Hill | NJ | 08003   | USA            |
| Hikma Pharmaceuticals, PLC | Hikma Pharmaceuticals USA,<br>Inc.—Research & Development                   | 300 Northfield Rd                  | Bedford     | OH | 44146   | USA            |

| Parent Company             | Company Name                 | Address   | City         | ST | Zip     | Country        |
|----------------------------|------------------------------|---|--------------|----|---------|----------------|
| Hikma Pharmaceuticals, PLC | Hikma Portugal               | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Qatar                  | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Saudi Arabia           | Al Jazeerah Pharmaceutical<br>Industries, P.O. Box 106229 | 11666 Riyadh |    |         | Saudi Arabia   |
| Hikma Pharmaceuticals, PLC | Hikma Slovakia               | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Sudan - Pharma Ixir    | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Sudan - Pharmaland     | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Sudan - Savanna        | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Tunisia - Ibn Al Bitar | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Tunisia - Medicef      | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Hikma Pharmaceuticals, PLC | Hikma Yemen                  | 1 New Burlington Place,<br>Mayfair                        | London       |    | W1S 2HR | United Kingdom |
| Horizon Pharma plc.        |                              | 150 S. Saunders Rd.                                       | Lake Forest  | IL | 60045   | USA            |

| Parent Company                | Company Name  | Address                                  | City         | ST | Zip   | Country |
|-------------------------------|---|--|--------------|----|-------|---------|
| Horizon Pharma plc.           | Horizon Orphan LLC  | 150 S. Saunders Rd.                      | Lake Forest  | IL | 60045 | USA     |
| Horizon Pharma plc.           | Horizon Pharma Rheumatology LLC (formerly known as Crealta Pharmaceuticals LLC) | 150 S. Saunders Rd.                      | Lake Forest  | IL | 60045 | USA     |
| Horizon Pharma plc.           | Horizon Pharma USA, Inc.  | 150 S. Saunders Rd.                      | Lake Forest  | IL | 60045 | USA     |
| Horizon Pharma plc.           | Horizon Therapeutics, Inc.  | 150 S. Saunders Rd.                      | Lake Forest  | IL | 60045 | USA     |
| Horizon Pharma plc.           | HZNP USA, Inc.  | 150 Saunders Rd                          | Lake Forest  | IL | 60045 | USA     |
| Humco Holding Group, Inc.     | Humco Holding Group, Inc.   | 7400 Alumax Drive                        | Texarkana    | TX | 75501 | USA     |
| Incyte Corporation            | Incyte Corporation  | Attn: Incyte Corporation, P.O Box 42405  | Indianapolis | IN | 46241 | USA     |
| Indivior Inc                  | Indivior Inc  | 10710 Midlothian Turnpike, Suite 430     | Richmond     | VA | 23235 | USA     |
| Ingenus Pharmaceuticals, LLC  | Ingenus Pharmaceuticals, LLC  | 4190 Millenia Blvd.                      | Orlando      | FL | 32839 | USA     |
| Intergel Pharmaceuticals Inc. | International Vitamin Corporation   | 500 Halls Mill Rd                        | Freehold     | NJ | 07728 | USA     |
| Invagen Pharmaceuticals, Inc. | Cipla USA, Inc.   | 7 Oser Avenue                            | Hauppauge    | NY | 11788 | USA     |
| Invagen Pharmaceuticals, Inc. | Cipla USA, Inc.   | 1560 Sawgrass Corporate Parkway, STE 130 | Sunrise      | FL | 33323 | USA     |

| Parent Company                       | Company Name                                 | Address   | City                       | ST     | Zip     | Country        |
|--------------------------------------|--|---|----------------------------|--------|---------|----------------|
| Ipsen Biopharmaceuticals, Inc        | Ipsen Biopharmaceuticals, Inc                | 106 Allen Road  | Basking Ridge              | NJ     | 07920   | USA            |
| Ironwood Pharmaceuticals, Inc.       | Ironwood Pharmaceuticals, Inc.               | 301 Binney Street                                     | Cambridge                  | MA     | 02142   | USA            |
| Jacobus Pharmaceutical Company, Inc. | Jacobus Pharmaceutical Company, Inc.         | 37 Cleveland Ln PO Box 5290                           | Princeton                  | NJ     | 08540   | USA            |
| Jazz Pharmaceuticals, plc            | Jazz Pharmaceuticals, Inc.                   | 3180 Porter Drive                                     | Palo Alto                  | CA     | 94304   | USA            |
| Jazz Pharmaceuticals, plc            | Jazz Pharmaceuticals, International Division | Wing B, Building 5700, Spires House, John Smith Drive | Oxford Business Park South | Oxford | OX4 2RW | United Kingdom |
| Johnson & Johnson                    | Johnson & Johnson                            | One Johnson & Johnson Plaza, WH-7113                  | New Brunswick              | NJ     | 08933   | USA            |
| Johnson & Johnson                    | Actelion                                     | One Johnson & Johnson Plaza, WH-7113                  | New Brunswick              | NJ     | 08933   | USA            |
| Johnson & Johnson                    | Janssen Biotech, Inc.                        | 800/850 Ridgeview Drive                               | Horsham                    | PA     | 19044   | USA            |
| Johnson & Johnson                    | Janssen Pharmaceuticals, Inc.                | 1125 Trenton-Harbourton Road                          | Titusville                 | NJ     | 08560   | USA            |
| Johnson & Johnson                    | Janssen Products, LP                         | 800/850 Ridgeview Dr.                                 | Horsham                    | PA     | 19044   | USA            |
| Johnson & Johnson                    | Johnson & Johnson Consumer, Inc.             | 199 Grandview Road                                    | Skillman                   | NJ     | 08558   | USA            |
| Johnson & Johnson                    | Johnson & Johnson Surgical Vision Inc        | One Johnson & Johnson Plaza, WH-7113                  | New Brunswick              | NJ     | 08933   | USA            |

| Parent Company                        | Company Name                                 | Address                          | City            | ST          | Zip   | Country     |
|---------------------------------------|--|----------------------------------|-----------------|-------------|-------|-------------|
| Johnson & Johnson                     | McNeil Consumer Healthcare Latin America LLC | 7050 Camp Hill Road              | Fort Washington | PA          | 19034 | USA         |
| Johnson & Johnson                     | McNeil Consumer Pharmaceuticals Co.          | 7050 Camp Hill Rd                | Fort Washington | PA          | 19034 | USA         |
| Johnson & Johnson                     | McNeil Healthcare LLC                        | Road 183 KM 19.8                 | Barrio Montones | Las Piedras | 00771 | Puerto Rico |
| Johnson & Johnson                     | McNeil MMP, LLC                              | One Johnson & Johnson Plaza      | New Brunswick   | NJ          | 08933 | USA         |
| Johnson & Johnson                     | McNeil Nutritionals LLC                      | 7050 Camp Hill Road              | Fort Washington | PA          | 19034 | USA         |
| Johnson & Johnson                     | McNeil-PPC, Inc.                             |                                  |                 |             |       |             |
| Johnson & Johnson                     | Ortho-McNeil Finance LLC                     | 6018 Bowendale Avenue            | Jacksonville    | FL          | 32216 | USA         |
| Johnson & Johnson                     | Patriot Pharmaceuticals, LLC                 | 200 Tournament Drive             | Horsham         | PA          | 19044 | USA         |
| Jubilant Cadista Pharmaceuticals Inc. | Jubilant Cadista Pharmaceuticals Inc.        | 207 Kiley Drive                  | Salisbury       | MD          | 21801 | USA         |
| Kadmon Corporation, LLC               | Kadmon Corporation, LLC                      | 119 Commonwealth Dr              | Warrendale      | PA          | 15086 | USA         |
| Kadmon Corporation, LLC               | Kadmon Pharmaceuticals, LLC                  | 1450 East 29th Street, 5th Floor | New York        | NY          | 10016 | USA         |
| Kaleo Inc.                            | Kaleo Inc.                                   | 111 Virginia Street Suite 300    | Richmond        | VA          | 23219 | USA         |
| Kowa Pharmaceuticals America, Inc.    | Kowa Pharmaceuticals America, Inc.           | 530 Industrial Park Blvd.        | Montgomery      | AL          | 36117 | USA         |

| Parent Company        | Company Name   | Address                                  | City                  | ST     | Zip   | Country |
|-----------------------|--|--|-----------------------|--------|-------|---------|
| Kyowa Kirin, Inc.     | Kyowa Kirin, Inc.  | 135 Route 202-206, Suite 6               | Bedminster            | NJ     | 07921 | USA     |
| L. Perrigo Company    | L. Perrigo Company                                       | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Athena Neurosciences, LLC                                | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Cobrek Pharmaceuticals, Inc.                             | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Elan Pharmaceuticals, LLC                                | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Paddock Laboratories, LLC                                | 3940 Quebec Ave                          | Minneapolis           | MN     | 55427 | USA     |
| L. Perrigo Company    | Perrigo Company of Tennessee                             | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Perrigo Corporation Designated Activity Company          | Treasury Building                        | Lower Grand Canal St. | Dublin | 2     | Ireland |
| L. Perrigo Company    | Perrigo Florida, Inc.                                    | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Perrigo LLC  | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| L. Perrigo Company    | Perrigo New York, Inc.                                   | 1625 Bathgate Avenue                     | Bronx                 | NY     | 10457 | USA     |
| L. Perrigo Company    | Perrigo Pharma International Designated Activity Company | Treasury Building, Lower Grand Canal St. | Dublin                |        | 2     | Ireland |
| L. Perrigo Company    | Perrigo Pharmaceuticals Company                          | 515 Eastern Avenue                       | Allegan               | MI     | 49010 | USA     |
| Lannett Company, Inc. | Lannett Company, Inc.                                    | 13200 Townsend Rd                        | Philadelphia          | PA     | 19154 | USA     |

| Parent Company             | Company Name                       | Address                             | City         | ST | Zip   | Country |
|----------------------------|------------------------------------|-------------------------------------|--------------|----|-------|---------|
| Lannett Company, Inc.      | Cody Laboratories                  | 601 Yellowstone Avenue              | Cody         | WY | 82414 | USA     |
| Lannett Company, Inc.      | Kremers Urban Pharmaceuticals Inc. | 1101 C Avenue West                  | Seymour      | IN | 47274 | USA     |
| Lannett Company, Inc.      | Silarx Pharmaceuticals             | 1033 Stoneleigh Avenue              | Carmel       | NY | 10512 | USA     |
| Leadiant Biosciences, Inc. | Leadiant Biosciences, Inc.         | 9841 Washingtonian Blvd., Suite 500 | Gaithersburg | MD | 20878 | USA     |
| LEO Pharma A/S             | LEO Pharma A/S                     | 7 Giralda Farms 2nd Floor           | Madison      | NJ | 07940 | USA     |
| LEO Pharma A/S             | LEO Pharma Inc.                    | 7 Giralda Farms, 2nd Floor          | Madison      | NJ | 07940 | USA     |
| LF Beauty/ Lornamead       | LF Beauty/ Lornamead               | 1359 Broadway, 17th Floor           | New York     | NY | 10018 | USA     |
| LF Beauty/ Lornamead       | Lornamead Inc.                     | 175 Cooper Avenue                   | Tonawanda    | NY | 14150 | USA     |
| Lundbeck LLC               | Lundbeck LLC                       | Six Parkway N Ste 400               | Deerfield    | IL | 60015 | USA     |
| Lupin Pharmaceuticals. Inc | Lupin Pharmaceuticals. Inc         | 111 S. Calvert St.                  | Baltimore    | MD | 21202 | USA     |
| Lupin Pharmaceuticals. Inc | GAVIS Pharma LLC                   | 400 Campus Drive                    | Somerset     | NJ | 08873 | USA     |
| Lupin Pharmaceuticals. Inc | GAVIS Pharmaceuticals LLC          | 400 Campus Drive                    | Somerset     | NJ | 08873 | USA     |
| Lupin Pharmaceuticals. Inc | Lupin Ltd.                         |                                     |              |    |       |         |
| Lupin Pharmaceuticals. Inc | Lupin Pharmaceuticals, Inc.        | 111 S. Calvert St.                  | Baltimore    | MD | 21202 | USA     |
| Lupin Pharmaceuticals. Inc | Novel Laboratories Inc.            | 400 Campus Drive                    | Somerset     | NJ | 08873 | USA     |

| Parent Company               | Company Name  | Address  | City        | ST | Zip   | Country |
|------------------------------|---|--|-------------|----|-------|---------|
| Mallinckrodt Pharmaceuticals | Mallinckrodt Pharmaceuticals                          | 675 McDonnell Blvd.                            | Hazelwood   | MO | 63042 | USA     |
| Matrixx Initiatives, Inc.    | Matrixx Initiatives, Inc.                             | 440 Rt. 22 E, Suite 130                        | Bridgewater | NJ | 08807 | USA     |
| Mayne Pharma Inc.            | Mayne Pharma Inc.                                     | 1240 Sugg Parkway                              | Greenville  | NC | 27834 | USA     |
| Mayne Pharma Inc.            | Libertas Pharma Inc                                   | 1240 Sugg Parkway                              | Greenville  | NC | 27834 | USA     |
| Mayne Pharma Inc.            | Metrics Inc DBA Mayne Pharma                          | 1240 Sugg Parkway                              | Greenville  | NC | 27834 | USA     |
| Merck & Co., Inc.            | Merck & Co., Inc.                                     | 351 N. Sumneytown Pike, P.O. Box 1000, UG3A-90 | North Wales | PA | 19454 | USA     |
| Merck & Co., Inc.            | Cherokee Pharmaceutical LLC                           | 100 Avenue C                                   | Riverside   | PA | 17868 | USA     |
| Merck & Co., Inc.            | Cubist Pharmaceuticals                                | 55 Hayden Avenue                               | Lexington   | MA | 02421 | USA     |
| Merck & Co., Inc.            | Intervet, Inc., doing business as Merck Animal Health | 2 Giralda Farms                                | Madison     | NJ | 07940 | USA     |
| Merck & Co., Inc.            | Merck Sharp & Dohme Corp.                             | 2000 Galloping Hill Rd                         | Kenilworth  | NJ | 07033 | USA     |
| Merck & Co., Inc.            | Organon Teknika Corporation, LLC                      | 100 Rudolphe St, Building 1300                 | Durham      | NC | 37172 | USA     |
| Merck & Co., Inc.            | Organon Teknika LLC                                   | 100 Rodolphe Street, Building 1300             | Durham      | NC | 37172 | USA     |
| Merz North America, Inc.     | Merz North America, Inc.                              | 6501 Six Forks Road                            | Raleigh     | NC | 27615 | USA     |

| Parent Company                  | Company Name                         | Address   | City         | ST | Zip   | Country |
|---------------------------------|--------------------------------------|---|--------------|----|-------|---------|
| Merz North America, Inc.        | Merz N.A. f/k/a Merz Aesthetics, Inc | 6501 Six Forks Road                                 | Raleigh      | NC | 27615 | USA     |
| Merz North America, Inc.        | Merz North America, Inc.             | 13900 Grandview Parkway                             | Sturtevant   | WI | 53177 | USA     |
| Merz North America, Inc.        | Merz Pharmaceuticals, LLC            | 6501 Six Forks Road                                 | Raleigh      | NC | 27615 | USA     |
| Midatech Pharma US Inc.         | Midatech Pharma US Inc.              | Forum I, 8601 Six Forks Rd Ste 400                  | Raleigh      | NC | 27615 | USA     |
| Mikart, LLC                     | Mikart, LLC                          | 1750 Chatahoochee Ave NW                            | Atlanta      | GA | 30318 | USA     |
| Mission Pharmacal Company       | Mission Pharmacal Company            | P.O. Box 786099                                     | San Antonio  | TX | 78278 | USA     |
| Mission Pharmacal Company       | Prosolus, Inc.                       | 6701 NW 7th St Ste 165                              | Miami        | FL | 33126 | USA     |
| Mist Pharmaceuticals, LLC       | Mist Pharmaceuticals, LLC            | 11 Commerce Drive, Suite 100                        | Cranford     | NJ | 07016 | USA     |
| Moberg Pharma North America LLC | Moberg Pharma North America LLC      | 7 E Frederick Place, Suite 100                      | Cedar Knolls | NJ | 07927 | USA     |
| Mylan Inc.                      | Alphapharm Pty Ltd                   | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown   | WV | 26505 | USA     |
| Mylan Inc.                      | DPT Laboratories LTD (DD)            | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown   | WV | 26505 | USA     |
| Mylan Inc.                      | DPT Laboratories LTD (JS)            | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown   | WV | 26505 | USA     |
| Mylan Inc.                      | Meda Pharmaceuticals, Inc.           | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown   | WV | 26505 | USA     |

| Parent Company    | Company Name  | Address   | City       | ST | Zip   | Country |
|-------------------|---|---|------------|----|-------|---------|
| <b>Mylan Inc.</b> | Mylan Consumer Healthcare, Inc. (fka Meda Consumer Healthcare Inc.) | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Institutional Galway  | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Institutional Inc. (IL)                                       | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Institutional Inc. (TX)                                       | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Institutional LLC   | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (1606-1609JP)                            | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (20/21JP)                                | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (BL)                                     | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (F4/F12OSD)                              | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (H12/H13OSD)                             | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |

| Parent Company    | Company Name                                    | Address   | City       | ST | Zip   | Country |
|-------------------|---|---|------------|----|-------|---------|
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (OTL)                | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (SF)                 | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (SFF)                | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Laboratories Limited (SPD)                | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan LLC                                       | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Pharmaceuticals, Inc.                     | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Specialty L.P.                            | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan Technologies, Inc.                        | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Mylan.D.T., Inc. (fka Renaissance Pharma, Inc.) | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Prestium Pharma, Inc.                           | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |
| <b>Mylan Inc.</b> | Somerset Pharmaceuticals, Inc.                  | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown | WV | 26505 | USA     |

| Parent Company                             | Company Name  | Address   | City          | ST | Zip   | Country |
|--|---|---|---------------|----|-------|---------|
| <b>Mylan Inc.</b>                          | Wallace Pharmaceuticals, Inc.                               | C/O Joseph Shepherd Reg Affs, 781 Chestnut Ridge Rd | Morgantown    | WV | 26505 | USA     |
| <b>Neos Therapeutics, Inc.</b>             | Neos Therapeutics, Inc.                                     | 2940 N State Highway 360 Ste 400                    | Grand Prairie | TX | 75050 | USA     |
| <b>Neos Therapeutics, Inc.</b>             | Neos Therapeutics Brand LLC                                 | 2940 N. State Highway 360, Suite 400                | Grand Prairie | TX | 75050 | USA     |
| <b>Nephron Pharmaceuticals Corporation</b> | Nephron Pharmaceuticals Corporation                         | 4500 12th Street Ext                                | West Columbia | SC | 29172 | USA     |
| <b>Nephron Pharmaceuticals Corporation</b> | Nephron Pharmaceuticals Corporation - Distribution Center 1 | 840 S. 67th Avenue                                  | Phoenix       | AZ | 85043 | USA     |
| <b>Nephron Pharmaceuticals Corporation</b> | Nephron Pharmaceuticals Corporation - Distribution Center 2 | 78 Spruce Street                                    | Murray        | KY | 42071 | USA     |
| <b>Neurocrine Biosciences, Inc.</b>        | Neurocrine Biosciences, Inc.                                | 12780 El Camino Real                                | San Diego     | CA | 92130 | USA     |
| <b>Nexgen Pharma, Inc.</b>                 | Nexgen Pharma, Inc.   | 46 Corporate Park, Suite 100                        | Irvine        | CA | 92606 | USA     |
| <b>NEXTSOURCE BIOTECHNOLOGY LLC</b>        | NEXTSOURCE BIOTECHNOLOGY LLC                                | 80 SW 8th St Ste 2660                               | Miami         | FL | 33130 | USA     |
| <b>Novartis Group Companies</b>            | Novartis Group Companies                                    | 59 Route 10   | East Hanover  | NJ | 07936 | USA     |
| <b>Novartis Group Companies</b>            | Alcon Laboratories, Inc.                                    | 6740 Business Parkway                               | Elkridge      | MD | 21075 | USA     |
| <b>Novartis Group Companies</b>            | Eon Labs, Inc.  | 4700 Sandoz Drive                                   | Wilson        | NC | 27893 | USA     |

| Parent Company                      | Company Name                         | Address                               | City         | ST      | Zip     | Country |
|-------------------------------------|--------------------------------------|---------------------------------------|--------------|---------|---------|---------|
| Novartis Group Companies            | Fougera Pharmaceuticals Inc.         | 60 Baylis Road                        | Melville     | NY      | 11747   | USA     |
| Novartis Group Companies            | Novartis Pharmaceuticals Corporation | 1 Health Plaza                        | East Hanover | NJ      | 07936   | USA     |
| Novartis Group Companies            | Sandoz Inc.                          | 100 College Road West                 | Princeton    | NJ      | 08540   | USA     |
| Noven Pharmaceuticals, Inc.         | Noven Pharmaceuticals, Inc.          | 11960 SW 144th St                     | Miami        | FL      | 33186   | USA     |
| Noven Pharmaceuticals, Inc.         | Hisamitsu America, Inc.              | 100 Campus Drive, Suite 117           | Florham Park | NJ      | 07932   | USA     |
| Noven Pharmaceuticals, Inc.         | Noven Therapeutics, LLC              | 11960 NW 144th St                     | Miami        | FL      | 33186   | USA     |
| Novo Nordisk Inc.                   | Novo Nordisk Inc.                    | 800 Scudders Mill Road                | Plainsboro   | NJ      | 08536   | USA     |
| Optinose US, Inc.                   | Optinose US, Inc.                    | 1020 Stony Hill Road, Suite 300       | Yardley      | PA      | 19067   | USA     |
| OrchidPharma, Inc.                  | OrchidPharma, Inc.                   | 4 Independence Way Ste 125            | Princeton    | NJ      | 08540   | USA     |
| OrchidPharma, Inc.                  | Orchid Pharma Ltd.                   | 313 Valluvar Kottam High Rd           | Nungambakkam | Chennai | 600 034 | India   |
| Orexigen Therapeutics, Inc.         | Orexigen Therapeutics, Inc.          | 3344 N. Torrey Pines Court, Suite 200 | La Jolla     | CA      | 92037   | USA     |
| Otsuka America Pharmaceutical, Inc. | Otsuka America Pharmaceutical, Inc.  | 508 Carnegie Center                   | Princeton    | NJ      | 08540   | USA     |
| PARI Respiratory Equipment, Inc.    | PARI Respiratory Equipment, Inc.     | 2412 Pari Way                         | Midlothian   | VA      | 23112   | USA     |
| Pegasus Laboratories, Inc.          | Pegasus Laboratories, Inc.           | 8809 Ely Road                         | Pensacola    | FL      | 32514   | USA     |

| Parent Company                     | Company Name                        | Address                         | City        | ST | Zip   | Country |
|------------------------------------|-------------------------------------|---------------------------------|-------------|----|-------|---------|
| Pfizer Inc.                        | Pfizer Inc.                         | 235 East 42nd Street, MS 219-5  | New York    | NY | 10017 | USA     |
| Pfizer Inc.                        | Greenstone LLC                      | 100 Route 206 North             | Peapack     | NJ | 07977 | USA     |
| Pfizer Inc.                        | Hospira                             | 275 N. Fields Drive             | Lake Forest | IL | 60045 | USA     |
| Pfizer Inc.                        | Meridian Medical Technologies, Inc. | 8030 Litzinger Road             | St. Louis   | MO | 63144 | USA     |
| Pfizer Inc.                        | Pfizer Consumer Health              | 235 East 42nd Street, MS 219-5  | New York    | NY | 10017 | USA     |
| Pharmasphere, Inc.                 | Pharmasphere, Inc.                  | 120 Route 17 North              | Paramus     | NJ | 07652 | USA     |
| Pharmasphere, Inc.                 | Pharma-C, LLC                       | 120 Route 17 North              | Paramus     | NJ | 07652 | USA     |
| Pharmasphere, Inc.                 | WG Critical Care, LLC               | 120 Route 17 North              | Paramus     | NJ | 07652 | USA     |
| Pharming Healthcare Inc.           | Pharming Healthcare Inc.            | 685 Route 202/206, Suite 202    | Bridgewater | NJ | 08807 | USA     |
| Prestige Consumer Healthcare, Inc. | Prestige Consumer Healthcare, Inc.  | 660 White Plains Road,2nd Floor | Tarrytown   | NY | 10591 | USA     |
| Prestige Consumer Healthcare, Inc. | C.B. Fleet Company, Inc.            | 4615 Murray Place               | Lynchburg   | VA | 24502 | USA     |
| Prestige Consumer Healthcare, Inc. | C.B. Fleet Company, Incorporated    | 660 White Plains Road,2nd Floor | Tarrytown   | NY | 10591 | USA     |
| Prestige Consumer Healthcare, Inc. | DenTek Oral Care, Inc.              | 660 White Plains Road,2nd Floor | Tarrytown   | NY | 10591 | USA     |

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|------------------------------------|--|----------------------------------|-------------------|-------------|-------|-------------|
| Prestige Consumer Healthcare, Inc. | Insight Pharmaceuticals Corporation              | 660 White Plains Rd Ste 250      | Tarrytown         | NY          | 10591 | USA         |
| Prestige Consumer Healthcare, Inc. | Insight Pharmaceuticals LLC                      | 660 White Plains Road,2nd Floor  | Tarrytown         | NY          | 10591 | USA         |
| Prestige Consumer Healthcare, Inc. | Medtech Products Inc.                            | 660 White Plains Road, 2nd Floor | Tarrytown         | NY          | 10591 | USA         |
| Prestige Consumer Healthcare, Inc. | Prestige Brands, Inc.                            | 660 White Plains Road, Suite 205 | Tarrytown         | NY          | 10591 | USA         |
| Primus Pharmaceuticals, Inc.       | Primus Pharmaceuticals, Inc.                     | 7373 N Scottsdale Rd. B-200      | Scottsdale        | AZ          | 85253 | USA         |
| Product Quest Mfg.                 | Product Quest Mfg.                               | 330 Carswell Avenue              | Daytona Beach     | FL          | 32117 | USA         |
| PuraCap International, LLC         | Epic Pharma, LLC                                 | 227-15N, Conduit Ave.            | Laurelton         | NY          | 11413 | USA         |
| PuraCap International, LLC         | PuraCap Caribe                                   | Carr 698 km 0.8                  | Bo Mameyal Dorado | Puerto Rico | 00646 | Puerto Rico |
| PuraCap International, LLC         | PuraCap Laboratories LLC dba Blu Pharmaceuticals | 301 Robey St.                    | Franklin          | KY          | 42134 | USA         |
| PuraCap International, LLC         | PuraCap Pharmaceuticals, LLC                     | 20 Kingsbridge Rd                | Piscataway        | NJ          | 08854 | USA         |
| Purdue Pharma L.P.                 | Purdue Pharma L.P.                               | One Stamford Forum               | Stamford          | CT          | 06901 | USA         |
| Purdue Pharma L.P.                 | Purdue Pharmaceuticals L.P.                      | 4701 Purdue Drive                | Wilson            | NC          | 27893 | USA         |
| Purdue Pharma L.P.                 | Purdue Products L.P.                             | One Stamford Forum               | Stamford          | CT          | 06901 | USA         |

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|-----------------------------------|-------------------------------------|----------------------------------|---------------------|----|-------|---------|
| Purdue Pharma L.P.                | Rhodes Pharmaceuticals L.P.         | 498 Washington Street            | Coventry            | RI | 02816 | USA     |
| RB Health (US) LLC                | RB Health (US) LLC                  | 399 Interpace Parkway            | Parsippany          | NJ | 07054 | USA     |
| Regeneron Pharmaceuticals, Inc    | Regeneron Pharmaceuticals, Inc      | 777 Old Saw Mill River Rd        | Tarrytown           | NY | 10591 | USA     |
| Regeneron Pharmaceuticals, Inc    | Regeneron Healthcare Solutions, Inc | 745 Old Saw Mill River Rd        | Tarrytown           | NY | 10591 | USA     |
| Regeneron Pharmaceuticals, Inc    | Regeneron Ireland Unlimited Company | Raheen Business Park             | Limerick            |    |       | Ireland |
| Roche Holdings                    | Roche Holdings                      | 1 Dna Way                        | South San Francisco | CA | 94080 | USA     |
| Roche Holdings                    | Genentech USA                       | Genetech, Inc., 1 DNA Way        | South San Francisco | CA | 94080 | USA     |
| Roche Holdings                    | Genentech, Inc.                     | Hoffman-La Roche Inc., 1 DNA Way | South San Francisco | CA | 94080 | USA     |
| Rouses Point Pharmaceuticals, LLC | Rouses Point Pharmaceuticals, LLC   | 11 Commerce Drive, First Floor   | Cranford            | NJ | 07016 | USA     |
| Sanofi-Aventis US LLC.            | Sanofi-Aventis US LLC.              | 55 Corporate Drive               | Bridgewater         | NJ | 08807 | USA     |
| Sanofi-Aventis US LLC.            | Chattem, Inc.                       | 1715 West 38th St.               | Chattanooga         | TN | 37409 | USA     |
| Sebela Pharmaceuticals Inc.       | Sebela Pharmaceuticals Inc.         | 645 Hembree Pkwy, Suite I        | Roswell             | GA | 30076 | USA     |

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|-----------------------------|---|--|--------------|----|-------|---------|
| Sebela Pharmaceuticals Inc. | Affordable Pharmaceuticals LLC                              | 60 Columbian St. West Suite 200, P.O. Box 850253 | Braintree    | MA | 02185 | USA     |
| Sebela Pharmaceuticals Inc. | Braintree Laboratories Inc.                                 | 60 Columbian Street West, P.O. Box 850929        | Braintree    | MA | 02185 | USA     |
| Shionogi Inc.               | Shionogi Inc.   | 300 Campus Dr.                                   | Florham Park | NJ | 07932 | USA     |
| Shire Pharmaceuticals LLC   | Shire Pharmaceuticals LLC                                   | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Baxalta US Inc.   | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Dyax Corporation  | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Shire Human Genetic Therapies, Inc.                         | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Shire LLC   | 9200 Brookfield Court                            | Florence     | KY | 41042 | USA     |
| Shire Pharmaceuticals LLC   | Shire NPS Pharmaceuticals (f/k/a NPS Pharmaceuticals, Inc.) | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Shire Orphan Therapies Inc.                                 | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Shire US Inc.   | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | Shire US Manufacturing Inc.                                 | 1200 Morris Drive                                | Wayne        | PA | 19087 | USA     |
| Shire Pharmaceuticals LLC   | Shire ViroPharma, Inc.                                      | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |
| Shire Pharmaceuticals LLC   | ViroPharma Biologics Inc.                                   | 300 Shire Way                                    | Lexington    | MA | 02421 | USA     |

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|--|---|--|---------------|-----------------|--------|---------|
| <b>SigmaPharm Laboratories LLC</b>                                   | SigmaPharm Laboratories LLC                           | 3375 Progress Drive  | Bensalem      | PA              | 19020  | USA     |
| <b>Silvergate Pharmaceuticals, Inc.</b>                              | Silvergate Pharmaceuticals, Inc.                      | 7300 W 110th St Ste 950  | Overland Park | KS              | 66210  | USA     |
| <b>Smith &amp; Nephew, Inc. (Smith &amp; Nephew Biotherapeutics)</b> | Smith & Nephew, Inc. (Smith & Nephew Biotherapeutics) | Attn: David Mize, VP Dist, Finance, 5600 Clearfork Main St., Suite 600 | Ft. Worth     | TX              | 76107  | USA     |
| <b>Stallergenes Greer</b>  | Stallergenes Greer                                    | 179 Lincoln St Ste 303   | Boston        | MA              | 02111  | USA     |
| <b>Stallergenes Greer</b>  | Stallergenes Greer                                    | 639 Nuway Circle NE  | Lenoir        | NC              | 28645  | USA     |
| <b>Strides Shasun Limited</b>  | Strides Shasun Limited                                | Strides House, Bilekahalli, Banneraghatta Road                         | BANGALURU     | Karnataka State | 560076 | India   |
| <b>Sun Pharmaceutical Industries, Inc.</b>                           | Sun Pharmaceutical Industries, Inc.                   | 270 Prospect Plains Road   | Cranbury      | NJ              | 08512  | USA     |
| <b>Sun Pharmaceutical Industries, Inc.</b>                           | AR Scientific, Inc.                                   | 1100 Orthodox St.  | Philadelphia  | PA              | 19124  | USA     |
| <b>Sun Pharmaceutical Industries, Inc.</b>                           | Caraco Pharma, Inc.                                   | 270 Prospect Plains Road   | Cranbury      | NJ              | 08512  | USA     |
| <b>Sun Pharmaceutical Industries, Inc.</b>                           | Chattem Chemicals, Inc.                               | 3708 St. Elmo Avenue   | Chattanooga   | TN              | 37409  | USA     |
| <b>Sun Pharmaceutical Industries, Inc.</b>                           | Dungan Mutual Associates, LLC                         | 1100 Orthodox St.  | Philadelphia  | PA              | 19124  | USA     |

| Parent Company                      | Company Name                        | Address                           | City          | ST | Zip   | Country |
|-------------------------------------|-------------------------------------|-----------------------------------|---------------|----|-------|---------|
| Sun Pharmaceutical Industries, Inc. | DUSA Pharmaceuticals New York, Inc. | 25 Upton Drive                    | Wilmington    | MA | 01887 | USA     |
| Sun Pharmaceutical Industries, Inc. | DUSA Pharmaceuticals, Inc.          | 25 Upton Drive                    | Wilmington    | MA | 01887 | USA     |
| Sun Pharmaceutical Industries, Inc. | Mutual Pharmaceutical Company, Inc. | 1100 Orthodox St.                 | Philadelphia  | PA | 19124 | USA     |
| Sun Pharmaceutical Industries, Inc. | Ohm Laboratories Inc.               | 14 Terminal Road                  | New Brunswick | NJ | 08901 | USA     |
| Sun Pharmaceutical Industries, Inc. | Pharmalucence, Inc.                 | 29 Dunham Road                    | Billerica     | MA | 01821 | USA     |
| Sun Pharmaceutical Industries, Inc. | Ranbaxy Laboratories Limited        | 600 College Road East, Suite 2100 | Princeton     | NJ | 08540 | USA     |
| Sun Pharmaceutical Industries, Inc. | Sirius Laboratories, Inc.           | 25 Upton Drive                    | Wilmington    | MA | 01887 | USA     |
| Sun Pharmaceutical Industries, Inc. | Taro Pharmaceuticals U.S.A., Inc.   | 3 Skyline Drive                   | Hawthorne     | NY | 10532 | USA     |
| Sun Pharmaceutical Industries, Inc. | United Research Laboratories, Inc.  | 1100 Orthodox St.                 | Philadelphia  | PA | 19124 | USA     |
| Sun Pharmaceutical Industries, Inc. | URL Pharma, Inc.                    | 1100 Orthodox St.                 | Philadelphia  | PA | 19124 | USA     |
| Sun Pharmaceutical Industries, Inc. | URL PharmPro, LLC                   | 1100 Orthodox St.                 | Philadelphia  | PA | 19124 | USA     |

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| Sunovion Pharmaceuticals Inc.       | Sunovion Pharmaceuticals Inc.                            | 84 Waterford Dr                                | Marlborough | MA | 01752 | USA     |
| Sunstar Americas, Inc.              | Sunstar Americas, Inc.                                   | 301 East Central Road                          | Schaumburg  | IL | 60195 | USA     |
| Supernus Pharmaceuticals, Inc.      | Supernus Pharmaceuticals, Inc.                           | 1550 E. Gude Drive                             | Rockville   | MD | 20850 | USA     |
| Takeda Pharmaceuticals U.S.A., Inc. | Takeda Pharmaceuticals America, Inc.                     | One Takeda Parkway                             | Deerfield   | IL | 60015 | USA     |
| Takeda Pharmaceuticals U.S.A., Inc. | Millennium Pharmaceuticals, Inc. (d/b/a Takeda Oncology) | 40 Lansdowne Street                            | Cambridge   | MA | 02139 | USA     |
| Takeda Pharmaceuticals U.S.A., Inc. | Takeda Pharmaceuticals America, Inc.                     | One Takeda Parkway                             | Deerfield   | IL | 60015 | USA     |
| Tec Laboratories, Inc.              | Tec Laboratories, Inc.                                   | 7100 Tec Labs Way SW                           | Albany      | OR | 97321 | USA     |
| TerSera Therapeutics LLC            | TerSera Therapeutics LLC                                 | Two Conway Park, 150 N. Field Drive, Suite 195 | Lake Forest | IL | 60045 | USA     |
| TESARO, Inc.                        | TESARO, Inc.   | 1000 Winter Street North, Suite 3300           | Waltham     | MA | 02451 | USA     |
| Teva Pharmaceuticals USA, Inc.      | Teva Pharmaceuticals USA, Inc.                           | 1090 Horsham Rd                                | North Wales | PA | 19454 | USA     |
| Teva Pharmaceuticals USA, Inc.      | Actavis Generics   | 400 Interpace Pkwy                             | Parsippany  | NJ | 07054 | USA     |

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|---|--|--|------------------------|-----------|----------|---------|
| <b>Teva Pharmaceuticals USA, Inc.</b>   | Barr Pharmaceuticals, Inc.                       | Morris Corporate Center III,<br>400 Interpace Pkwy | Parsippany             | NJ        | 07054    | USA     |
| <b>Teva Pharmaceuticals USA, Inc.</b>   | Cephalon, Inc.                                   | Morris Corporate Center III,<br>400 Interpace Pkwy | Parsippany             | NJ        | 07054    | USA     |
| <b>Teva Pharmaceuticals USA, Inc.</b>   | Teva Neuroscience Inc.                           | 11100 Nail Ave                                     | Overland Park          | KS        | 66221    | USA     |
| <b>The Mentholatum Company</b>          | The Mentholatum Company                          | 707 Sterling Drive                                 | Orchard Park           | NY        | 14127    | USA     |
| <b>The Mentholatum Company</b>          | Mentholatum (China)<br>Pharmaceuticals Co., Ltd. | The Second Industrial Estates                      | Sanxiang,<br>Zhongshan | Guangdong | 528463   | China   |
| <b>The Mentholatum Company</b>          | Rohto Pharmaceutical Co. Ltd.                    | 7-3 Yumegaoka, Ige                                 | Mie                    |           | 518-0131 | Japan   |
| <b>The Procter &amp; Gamble Company</b> | The Procter & Gamble Company                     | 1 Procter & Gamble Plaza                           | Cincinnati             | OH        | 45202    | USA     |
| <b>The Ritedose Corporation (TRC)</b>   | The Ritedose Corporation (TRC)                   | 1 Technology Circle                                | Columbia               | SC        | 29203    | USA     |
| <b>TherapeuticsMD, Inc.</b>             | TherapeuticsMD, Inc.                             | 6800 Broken Sound Parkway<br>NW, 3rd Fl            | Boca Raton             | FL        | 33487    | USA     |
| <b>Theratechnologies Inc.</b>           | Theratechnologies Inc.                           | 2015 Peel Street, 5th Floor                        | Montreal               | Quebec    | H3A1T8   | Canada  |
| <b>TOLMAR, Inc.</b>                     | TOLMAR, Inc.                                     | 701 Centre Avenue                                  | Fort Collins           | CO        | 80526    | USA     |
| <b>Trigen Laboratories, LLC</b>         | Trigen Laboratories, LLC                         | 400 Crossing Blvd                                  | Bridgewater            | NJ        | 08807    | USA     |
| <b>Trigen Laboratories, LLC</b>         | Vertical Pharmaceuticals, LLC                    | 400 Crossing Blvd                                  | Bridgewater            | NJ        | 08807    | USA     |

| Parent Company                        | Company Name                          | Address                       | City              | ST | Zip   | Country |
|---------------------------------------|---------------------------------------|-------------------------------|-------------------|----|-------|---------|
| Tris Pharma, Inc.                     | Tris Pharma, Inc.                     | 2033 Route 130                | Monmouth Junction | NJ | 08852 | USA     |
| UCB Inc.                              | UCB Inc.                              | 1950 Lake Park Drive          | Smyrna            | GA | 30080 | USA     |
| UCB Inc.                              | Upstate Pharma LLC                    | 1950 Lake Park Drive          | Smyrna            | GA | 30080 | USA     |
| Unichem Pharmaceuticals (USA), Inc.   | Unichem Pharmaceuticals (USA), Inc.   | 777 Terrace Avenue, Ste. 102  | Hasbrouck Heights | NJ | 07664 | USA     |
| Unichem Pharmaceuticals (USA), Inc.   | Unichem Laboratories Limited          | 777 Terrace Avenue            | Hasbrouck Heights | NJ | 07604 | USA     |
| Unichem Pharmaceuticals (USA), Inc.   | Unichem Laboratories Limited          | 777 Terrace Avenue, STE 102   | Hasbrouck Heights | NJ | 07604 | USA     |
| Unichem Pharmaceuticals (USA), Inc.   | Unichem Pharmaceuticals (USA), Inc.   | 777 Terrace Avenue, Ste. 102  | Hasbrouck Heights | NJ | 07664 | USA     |
| Upsher-Smith Laboratories, LLC        | Upsher-Smith Laboratories, LLC        | 6701 Evenstad Dr.             | Maple Grove       | MN | 55369 | USA     |
| Valeant Pharmaceuticals International | Valeant Pharmaceuticals International | 400 Somerset Corporate Blvd   | Bridgewater       | NJ | 08807 | USA     |
| Valeant Pharmaceuticals International | Bausch + Lomb                         | 1400 N. Goodman St.           | Rochester         | NY | 14609 | USA     |
| Valeant Pharmaceuticals International | Salix                                 | 400 Somerset Corporate Blvd   | Bridgewater       | NJ | 08807 | USA     |
| Validus Pharmaceuticals LLC           | Validus Pharmaceuticals LLC           | 119 Cherry Hill Road, Ste 310 | Parsippany        | NJ | 07054 | USA     |

| Parent Company                               | Company Name   | Address                                | City         | ST     | Zip    | Country |
|--|--|--|--------------|--------|--------|---------|
| <b>Vertex Pharmaceuticals Incorporated</b>   | Vertex Pharmaceuticals Incorporated                              | 50 Northern Avenue                     | Boston       | MA     | 02210  | USA     |
| <b>Vi-Jon, Inc.</b>                          | Vi-Jon, Inc.   | 8515 Page Ave                          | St. Louis    | MO     | 63114  | USA     |
| <b>VIVUS, Inc.</b>                           | VIVUS, Inc.  | 900 E Hamilton Ave Ste 550             | Campbell     | CA     | 95008  | USA     |
| <b>WellSpring Pharmaceutical Corporation</b> | WellSpring Pharmaceutical Corporation                            | 5911 N. Honore Avenue, Suite 211       | Sarasota     | FL     | 34243  | USA     |
| <b>Welmedix Consumer Healthcare</b>          | Welmedix Consumer Healthcare                                     | 103 Carnegie Center, Suite 200         | Princeton    | NJ     | 08540  | USA     |
| <b>Wisconsin Pharmacal Company, LLC</b>      | Wisconsin Pharmacal Company, LLC                                 | 1 Pharmacal Way                        | Jackson      | WI     | 53037  | USA     |
| <b>Wisconsin Pharmacal Company, LLC</b>      | Lake Consumer Products, Inc. (subsidiary of Wisconsin Pharmacal) | 1 Pharmacal Way                        | Jackson      | WI     | 53037  | USA     |
| <b>Wockhardt USA LLC</b>                     | Wockhardt USA LLC  | 20 Waterview Blvd, 3rd Floor           | Parsippany   | NJ     | 07054  | USA     |
| <b>Wockhardt USA LLC</b>                     | Morton Grove Pharmaceuticals, Inc.                               | 6451 Main Street                       | Morton Grove | IL     | 60053  | USA     |
| <b>Wockhardt USA LLC</b>                     | Wockhardt Limited  | Wockhardt Towers, Bandra Kurla Complex | Bandra (E)   | Mumbai | 400051 | India   |
| <b>Wockhardt USA LLC</b>                     | Wockhardt USA LLC  | 20 Waterview Blvd., 3rd Floor          | Parsippany   | NJ     | 07054  | USA     |
| <b>X-GEN Pharmaceuticals, Inc.</b>           | X-GEN Pharmaceuticals, Inc.                                      | 300 Daniel Zenker Drive                | Horseheads   | NY     | 14845  | USA     |

| Parent Company                | Company Name                  | Address                    | City           | ST | Zip   | Country |
|-------------------------------|-------------------------------|----------------------------|----------------|----|-------|---------|
| Xttrium Laboratories, Inc.    | Xttrium Laboratories, Inc.    | 1200 E. Business Center Dr | Mount Prospect | IL | 60056 | USA     |
| Zoetis                        | Zoetis                        | One Pfizer Way             | Lee's Summit   | MO | 64081 | USA     |
| Zydus Pharmaceuticals USA Inc | Zydus Pharmaceuticals USA Inc | 73 Route 31 North          | Pennington     | NJ | 08534 | USA     |

## Appendix B

### Sample Contact List for Outreach and Education to the Community

The following are Associations, Agencies, and Organizations that may be contacted for assistance with outreach and education to the community.

#### Hospitals and Health Systems:

Stanford Health Care  
Sutter Health Care  
Kaiser Permanente  
Lucille Packard Children’s Hospital Stanford  
Regional Medical Center  
Santa Clara Valley Medical Center  
Kaiser Permanente Santa Clara Medical Center  
El Camino Hospital  
VA Palo Alto Health Care System  
Kaiser Permanente Campbell Medical Offices  
Santa Clara Homestead Medical Center  
St. Louise Regional Hospital  
Sutter Health – Los Altos Center  
Kaiser Permanente Milpitas Medical Offices  
Hillview Convalescent Hospital  
Stanford Children’s Hospital  
St Thomas Medical Clinic  
Subacute Saratoga Hospital

#### Districts, Associations, Organizations, and Agencies:

County of Santa Clara  
Santa Clara County HHW  
SCC Consumer and Environmental Protection Agency  
Santa Clara County Public Health Department  
Santa Clara Emergency Medical Services  
City of Mountain View  
City of Sunnyvale  
City of Morgan Hill  
City of San Jose  
City of Santa Clara  
City of Palo Alto  
City of Cupertino  
City of Milpitas  
City of Campbell  
Town of Los Gatos

#### Districts, Associations, Organizations, and Agencies, continued:

City of Gilroy  
City of Los Altos  
City of Los Altos Hills  
Santa Clara Office Sheriff’s Office  
Santa Clara Police Department  
San Jose Police Department  
Sunnyvale Police Department  
Mountain View Police Department  
Los Altos Police Department  
Santa Clara Unified School District  
Santa Clara Office of Education  
San Jose State University  
Santa Clara University  
DeAnza College  
California Board of Pharmacy  
California Pharmacist Association  
California Nurses Association  
National Association of Social Workers California Chapter  
City of Campbell PD  
Sunnyvale Fire Station  
San Jose State University Police Department  
Milpitas PD  
City of Gilroy PD  
Morgan Hill PD  
Palo Alto PD  
City of Monte Sereno

## Appendix C

### Interested and Participating Kiosk Drop-Off Sites

MED-Project will provide the County with a list of participating Kiosk Drop-Off Sites, as required under the Ordinance and Regulations.

| SITE NAME                                    | ADDRESS                    | CITY        | ZIP CODE | STATUS |
|--|----------------------------|-------------|----------|--------|
| GILROY POLICE DEPARTMENT                     | 7301 HANNA STREET          | GILROY      | 95020    | ACTIVE |
| KAISER HEALTH PLAN 1 NORTH PHY 631           | 260 INTERNATIONAL CIRCLE   | SAN JOSE    | 95119    | ACTIVE |
| KAISER HEALTH PLAN MAIN PHY 752              | 7520 ARROYO CIRCLE         | GILROY      | 95020    | ACTIVE |
| KAISER PERMANENTE PHARMACY #634              | 250 HOSPITAL PARKWAY       | SAN JOSE    | 95119    | ACTIVE |
| LOS GATOS AND MONTE SERANO POLICE DEPARTMENT | 15900 LOS GATOS. BLVD.     | LOS GATOS   | 95030    | ACTIVE |
| MEDICAL PAVILION PHARMACY                    | 94060 NO NAME UNO          | GILROY      | 95020    | ACTIVE |
| MORGAN HILL POLICE DEPARTMENT                | 16200 VINEYARD BLVD        | MORGAN HILL | 95037    | ACTIVE |
| SANTA CLARA SHERIFF - 80 HIGHLAND            | 80 HIGHLAND AVE            | SAN MARTIN  | 95046    | ACTIVE |
| SORCI HEALTHCARE PHARMACY                    | 15714 LOS GATOS AVE        | LOS GATOS   | 95022    | ACTIVE |
| SOUTH VALLEY PHARMACY SERVICES               | 7496 EIGLEBERRY ST         | GILROY      | 95020    | ACTIVE |
| WELLNESS PHARMACY                            | 14777 LOS GATOS BLVD. #101 | LOS GATOS   | 95032    | ACTIVE |
| CVS/PHARMACY #09808                          | 470 BLOSSOM HILL RD        | SAN JOSE    | 95123    | ACTIVE |
| CVS/PHARMACY #09829                          | 5407 CAMDEN AVE            | SAN JOSE    | 95124    | ACTIVE |

| SITE NAME   | ADDRESS                     | CITY        | ZIP CODE | STATUS |
|---|-----------------------------|-------------|----------|--------|
| CVS/PHARMACY #09982                                       | 750 BLOSSOM HILL RD         | LOS GATOS   | 95032    | ACTIVE |
| CVS/PHARMACY #3938  | 1496 POLLARD RD             | LOS GATOS   | 95032    | ACTIVE |
| CVS/PHARMACY #9337  | 6910 ALMADEN EXPY           | SAN JOSE    | 95120    | ACTIVE |
| CVS/PHARMACY #9342  | 16995 WALNUT GROVE DRIVE    | MORGAN HILL | 95037    | ACTIVE |
| LONGS DRUG STORES CALIFORNIA LLC D/B/A CVS/PHARMACY #9945 | 800 1ST ST                  | GILROY      | 95020    | ACTIVE |
| ALUM ROCK PHARMACY  | 1855 ALUM ROCK AVE #A       | SAN JOSE    | 95116    | ACTIVE |
| CREEKSIDE PHARMACY  | 1863 ALUM ROCK AVE, SUITE A | SAN JOSE    | 95116    | ACTIVE |
| EVERGREEN PHARMACY  | 2365 QUIMBY RD #150         | SAN JOSE    | 95122    | ACTIVE |
| FRIENDLY #1 PHARMACY                                      | 485 LEWIS ROAD              | SAN JOSE    | 95111    | ACTIVE |
| GARCIA PHARMACY   | 25 NORTH 14TH ST STE 110    | SAN JOSE    | 95112    | ACTIVE |
| JACKSON MEDICAL PHARMACY                                  | 266 N. JACKSON AVE          | SAN JOSE    | 95116    | ACTIVE |
| LOS ALAMITOS PHARMACY INC.                                | 115 N. JACKSON AVE. #103    | SAN JOSE    | 95116    | ACTIVE |
| MEDEX HM PHARMACY   | 405 E SANTA CLARA ST.       | SAN JOSE    | 95113    | ACTIVE |
| SANTA CLARA SHERIFF - 55 W. YOUNGER                       | 55 W. YOUNGER AVE           | SAN JOSE    | 95110    | ACTIVE |
| SAVCO PHARMACY  | 455 O'CONNOR DRIVE          | SAN JOSE    | 95123    | ACTIVE |

| SITE NAME   | ADDRESS                         | CITY      | ZIP CODE | STATUS |
|---|---------------------------------|-----------|----------|--------|
| SENER PHARMACY INC.   | 2643 SENTER ROAD                | SAN JOSE  | 95111    | ACTIVE |
| TIFFANY THU INC DBA KING PHARMACY & DME                           | 2323 MONTEPELIER DRIVE, SUITE D | SAN JOSE  | 95116    | ACTIVE |
| CVS/PHARMACY #09395   | 525 W CAPITOL EXPY              | SAN JOSE  | 95136    | ACTIVE |
| CVS/PHARMACY #09810   | 1685 TULLY RD                   | SAN JOSE  | 95122    | ACTIVE |
| CVS/PHARMACY #09897   | 3074 STORY RD                   | SAN JOSE  | 95127    | ACTIVE |
| CVS/PHARMACY #2294  | 821 THE ALAMEDA                 | SAN JOSE  | 95126    | ACTIVE |
| SUN PHARMACY  | 2559 S KING RD STE B10          | SAN JOSE  | 95122    | ACTIVE |
| CALAVERAS PHARMACY  | 114 S PARK VICTORIA DR          | MILPITAS  | 95035    | ACTIVE |
| EVERGREEN PHARMACY  | 2690 S. WHITE ROAD              | SAN JOSE  | 95148    | ACTIVE |
| I-CARE PHARMACY   | 1727-B BERRYESSA ROAD           | SAN JOSE  | 95133    | ACTIVE |
| KAISER HEALTH PLAN MAIN PHY 381                                   | 770 CALAVERAS BOULEVARD         | MILPITAS  | 95035    | ACTIVE |
| KAISER HEALTH PLAN SOUTH PHY 383                                  | 611 SO. MILPITAS BOULEVARD      | MILPITAS  | 95035    | ACTIVE |
| NEMS - LUNDY PHARMACY   | 1870 LUNDY STREET               | SAN JOSE  | 95131    | ACTIVE |
| SAN JOSE / EVERGREEN COMMUNITY COLLEGE DISTRICT POLICE DEPARTMENT | 3095 YERBA BUENA ROAD           | SAN JOSE  | 95135    | ACTIVE |
| SUNNYVALE DEPT. OF PUBLIC SAFETY                                  | 700 ALL AMERICA WAY             | SUNNYVALE | 94086    | ACTIVE |

| SITE NAME                  | ADDRESS                       | CITY      | ZIP CODE | STATUS |
|----------------------------|-------------------------------|-----------|----------|--------|
| SUNNYVALE FIRE #1          | 171 N. MATHILDA AVE           | SUNNYVALE | 94086    | ACTIVE |
| SUNNYVALE FIRE #2          | 795 E. ARQUES AVE             | SUNNYVALE | 94086    | ACTIVE |
| SUNNYVALE FIRE #3          | 910 TICONDEROGA DR            | SUNNYVALE | 94086    | ACTIVE |
| SUNNYVALE FIRE #4          | 996 S. WOLFE ROAD             | SUNNYVALE | 94086    | ACTIVE |
| SUNNYVALE FIRE #5          | 1210 BORDEAUX DR              | SUNNYVALE | 94086    | ACTIVE |
| SUNNYVALE FIRE #6          | 1282 N. LAWRENCE STATION ROAD | SUNNYVALE | 94086    | ACTIVE |
| CVS/PHARMACY #09534        | 4850 SAN FELIPE RD            | SAN JOSE  | 95135    | ACTIVE |
| CVS/PHARMACY #09812        | 2514 BERRYESSA RD             | SAN JOSE  | 95132    | ACTIVE |
| CVS/PHARMACY #3061         | 3475 MCKEE RD                 | SAN JOSE  | 95127    | ACTIVE |
| CVS/PHARMACY #422          | 4110 N FIRST ST               | SAN JOSE  | 95134    | ACTIVE |
| CVS/PHARMACY #9161         | 45 N MILPITAS BLVD            | MILPITAS  | 95035    | ACTIVE |
| CVS/PHARMACY #9229         | 3220 S WHITE ROAD             | SAN JOSE  | 95148    | ACTIVE |
| BASCOM PHARMACY LLC        | 105 N BASCOM AVE #101         | SAN JOSE  | 95128    | ACTIVE |
| CAMPBELL POLICE DEPARTMENT | 70. NORTH 1ST ST              | CAMPBELL  | 95008    | ACTIVE |
| KAISER CAMPBELL PHARMACY   | 220 HACIENDA AVE              | CAMPBELL  | 95008    | ACTIVE |

| SITE NAME   | ADDRESS                            | CITY        | ZIP CODE | STATUS |
|---|------------------------------------|-------------|----------|--------|
| KAISER PERMANENTE PHARMACY 442                                    | 710 LAWRENCE EXPRESSWAY<br>FLOOR 1 | SANTA CLARA | 95051    | ACTIVE |
| MISSION COLLEGE POLICE DEPARTMENT                                 | 3000 MISSION COLLEGE BLVD          | SANTA CLARA | 95054    | ACTIVE |
| SAN JOSE / EVERGREEN COMMUNITY COLLEGE DISTRICT POLICE DEPARTMENT | 2100 MOORPARK ROAD                 | SAN JOSE    | 95128    | ACTIVE |
| SANTA CLARA POLICE DEPARTMENT                                     | 601 EL CAMINO REAL                 | SANTA CLARA | 95050    | ACTIVE |
| SANTA CLARA POLICE DEPARTMENT                                     | 3992 RIVERMARK PLAZA               | SANTA CLARA | 95054    | ACTIVE |
| CVS/PHARMACY #09498   | 1800 SARATOGA AVE                  | SAN JOSE    | 95129    | ACTIVE |
| CVS/PHARMACY #09559   | 1285 LINCOLN AVENUE                | SAN JOSE    | 95125    | ACTIVE |
| CVS/PHARMACY #09793   | 2700 HOMESTEAD RD                  | SANTA CLARA | 95051    | ACTIVE |
| CVS/PHARMACY #09805   | 1720 S BASCOM AVE                  | CAMPBELL    | 95008    | ACTIVE |
| CVS/PHARMACY #09895   | 100 N SAN TOMAS ACQUINO RD         | CAMPBELL    | 95008    | ACTIVE |
| CVS/PHARMACY #09901   | 1125 BRANHAM LN                    | SAN JOSE    | 95118    | ACTIVE |
| CVS/PHARMACY #09921   | 2069 CAMDEN AVE                    | SAN JOSE    | 95124    | ACTIVE |
| CVS/PHARMACY #09944   | 3081 STEVENS CREEK BLVD            | SANTA CLARA | 95050    | ACTIVE |
| CVS/PHARMACY #09995   | 1405 FOXWORTHY AVE                 | SAN JOSE    | 95118    | ACTIVE |
| CVS/PHARMACY #3029  | 1097 LEIGH AVE                     | SAN JOSE    | 95126    | ACTIVE |

| SITE NAME                       | ADDRESS                         | CITY          | ZIP CODE | STATUS |
|---------------------------------|---------------------------------|---------------|----------|--------|
| CVS/PHARMACY #9257              | 5170 MOORPARK AVE               | SAN JOSE      | 95129    | ACTIVE |
| CVS/PHARMACY #9262              | 222 SARATOGA AVE                | SANTA CLARA   | 95050    | ACTIVE |
| KAISER HEALTH PLAN PHY 421      | 555 CASTRO STREET               | MOUNTAIN VIEW | 94041    | ACTIVE |
| LOS ALTOS POLICE DEPARTMENT     | 1 N SAN ANTONIO ROAD            | LOS ALTOS     | 94022    | ACTIVE |
| MAXIMART PHARMACY               | 240 CAMBRIDGE AVENUE            | PALO ALTO     | 94306    | ACTIVE |
| MOUNTAIN VIEW POLICE DEPARTMENT | 1000 VILLA ST.                  | MOUNTAIN VIEW | 94041    | ACTIVE |
| SANTA CLARA SHERIFF             | 1601 S. DE ANZA BLVD #148       | CUPERTINO     | 95014    | ACTIVE |
| STANFORD HEALTHCARE PHARMACY    | 875 BLAKE WILBUR DR, STE CC1102 | PALO ALTO     | 94305    | ACTIVE |
| CVS/PHARMACY #09684             | 2630 W EL CAMINO REAL           | MOUNTAIN VIEW | 94040    | ACTIVE |
| CVS/PHARMACY #09700             | 576 E EL CAMINO REAL            | SUNNYVALE     | 94087    | ACTIVE |
| CVS/PHARMACY #09834             | 12940 SARATOGA SUNNYVALE RD     | SARATOGA      | 95070    | ACTIVE |
| CVS/PHARMACY #09856             | 1165 W EL CAMINO REAL           | SUNNYVALE     | 94087    | ACTIVE |
| CVS/PHARMACY #09894             | 10455 S DE ANZA BLVD            | CUPERTINO     | 95014    | ACTIVE |

| SITE NAME                                 | ADDRESS                | CITY          | ZIP CODE | STATUS      |
|---|------------------------|---------------|----------|-------------|
| CVS/PHARMACY #09915                       | 352 UNIVERSITY AVE     | PALO ALTO     | 94301    | ACTIVE      |
| CVS/PHARMACY #09984                       | 2701 MIDDLEFIELD RD    | PALO ALTO     | 94306    | ACTIVE      |
| CVS/PHARMACY #09987                       | 1798 MIRAMONTE AVE     | MOUNTAIN VIEW | 94040    | ACTIVE      |
| CVS/PHARMACY #7774                        | 850 CALIFORNIA ST      | MOUNTAIN VIEW | 94041    | ACTIVE      |
| CVS/PHARMACY #9198                        | 1675 HOLLENBECK AVENUE | SUNNYVALE     | 94087    | ACTIVE      |
| CVS/PHARMACY #9346                        | 1041 EL MONTE AVE      | MOUNTAIN VIEW | 94040    | ACTIVE      |
| PALO ALTO POLICE DEPARTMENT               | 275 FOREST AVENUE      | PALO ALTO     | 94031    | INTEREST ED |
| VALLEY HEALTH CENTER AT GILROY PHARMACY   | 7475 CAMINO ARROYO     | GILROY        | 95020    | INTEREST ED |
| VALLEY HEALTH CENTER AT DOWNTOWN PHARMACY | 777 E. SANTA CLARA ST. | SAN JOSE      | 95112    | INTEREST ED |
| VALLEY HEALTH CENTER AT LENZEN PHARMACY   | 976 LENZEN AVENUE      | SAN JOSE      | 95126    | INTEREST ED |
| VALLEY HEALTH CENTER AT TULLY PHARMACY    | 500 TULLY ROAD         | SAN JOSE      | 95111    | INTEREST ED |

| SITE NAME  | ADDRESS                       | CITY      | ZIP CODE | STATUS      |
|--|-------------------------------|-----------|----------|-------------|
| VALLEY HEALTH CENTER AT EAST VALLEY PHARMACY           | 1993 MCKEE ROAD               | SAN JOSE  | 95116    | INTEREST ED |
| VALLEY HEALTH CENTER AT SUNNYVALE PHARMACY             | 660 S FAIR OAKS AVE, STE 1057 | SUNNYVALE | 94086    | INTEREST ED |
| VALLEY HEALTH CENTER AT MILPITAS PHARMACY              | 143 N MAIN STREET, SUITE 1038 | MILPITAS  | 95035    | INTEREST ED |
| CVS/PHARMACY #09896                                    | 4550 MERIDIAN AVE             | SAN JOSE  | 95124    | SIGNED      |
| SANTA CLARA VALLEY MEDICAL CENTER                      | 751 SOUTH BASCOM AVE          | SAN JOSE  | 95128    | INTEREST ED |
| VALLEY HEALTH CENTER AT BASCOM PHARMACY                | 750 SOUTH BASCOM AVE          | SAN JOSE  | 95128    | INTEREST ED |
| VALLEY HEALTH CENTER AT MOORPARK PHARMACY              | 2400 MOORPARK AVE, SUITE 101  | SAN JOSE  | 95128    | INTEREST ED |
| CVS/PHARMACY #3935                                     | 855 EL CAMINO REAL            | PALO ALTO | 94301    | INTEREST ED |
| KAISER PERMANENTE PHARMACY #791                        | 1721 TECHNOLOGY DR, 1ST FL    | SAN JOSE  | 95110    | SIGNED      |
| PROBATION -ADULT SERVICES DIVISION -MAIN COUNTY OFFICE | 2314 NORTH FIRST ST.          | SAN JOSE  | 95134    | INTEREST ED |

## Appendix D

### Potential Additional Kiosk Drop-Off Sites

| SITE NAME  | ADDRESS                       | CITY        | ZIP CODE |
|--|-------------------------------|-------------|----------|
| BLOSSOM HILL PHARMACY                                | 393 BLOSSOM HILL RD #101      | SAN JOSE    | 95123    |
| COSTCO PHARMACY NO 760                               | 7251 CAMINO ARROYO            | GILROY      | 95020    |
| EL CAMINO HOSPITAL LOS GATOS                         | 815 POLLARD ROAD              | LOS GATOS   | 95030    |
| GARDNER SOUTH COUNTY HEALTH CENTER PHARMACY          | 7526 MONTEREY ST              | GILROY      | 95020    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 16971 | 6705 CAMINO ARROYO            | GILROY      | 95020    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17045 | 879 BLOSSOM HILL RD           | SAN JOSE    | 95123    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17327 | 1061 COCHRANE RD              | MORGAN HILL | 95037    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17588 | 5630 COTTLE RD                | SAN JOSE    | 95123    |
| GOOD SAMARITAN HOSPITAL                              | 2425 SAMARITAN DR             | SAN JOSE    | 95124    |
| HOME CHOICE PHARMACY INC                             | 1009 BLOSSOM RIVER WAY #228   | SAN JOSE    | 95123    |
| HORIZONS PHARMACY SERVICES                           | 15951 LOS GATOTS BLVD STE #12 | LOS GATOS   | 95032    |
| IBA MOLECULAR NORTH AMERICA INC                      | 5900 OBATA WAY, SUITE B       | GILROY      | 95020    |
| KAISER FDN HSP INP/OUT DIS PHY 63A 634               | 250 HOSPITAL PARKWAY          | SAN JOSE    | 95119    |
| KAISER ONCOLOGY PHRMCY #638                          | 270 INTERNATIONAL CIR 1ST FL  | SAN JOSE    | 95119    |
| LEITER'S ENTERPRISES INC DBA LEITER'S COMPOUNDING    | 17 GREAT OAKS BLVD            | SAN JOSE    | 95119    |
| LUCKY #759   | 129 BERNAL RD                 | SAN JOSE    | 95119    |
| LUCKY #763   | 844 BLOSSOM HILL RD           | SAN JOSE    | 95123    |

| SITE NAME                                 | ADDRESS                      | CITY        | ZIP CODE |
|---|------------------------------|-------------|----------|
| NOB HILL PHARMACY #602                    | 777 FIRST STREET             | GILROY      | 95020    |
| NOB HILL PHARMACY #635                    | 6061 SNELL AVE               | SAN JOSE    | 95123    |
| RITE AID 5970                             | 360 EAST 10TH STREET         | GILROY      | 95020    |
| RITE AID 5972                             | 15920 LOS GATOS BLVD         | LOS GATOS   | 95032    |
| RITE AID 5982                             | 1140 BLOSSOM HILL ROAD       | SAN JOSE    | 95118    |
| RITE AID 5983                             | 6215 SANTA TERESA BLVD       | SAN JOSE    | 95119    |
| RITE AID 5984                             | 6091 MERIDIAN AVENUE         | SAN JOSE    | 95120    |
| RITE AID NO 5975                          | 16000 MONTEREY ST            | MORGAN HILL | 95037    |
| SAFEWAY PHARMACY #0695                    | 6477 ALMADEN RD              | SAN JOSE    | 95120    |
| SAFEWAY PHARMACY #0997                    | 1663 BRANHAM LANE            | SAN JOSE    | 95118    |
| SAFEWAY PHARMACY #1245                    | 15549 UNION AVE              | LOS GATOS   | 95032    |
| SAFEWAY PHARMACY #1455                    | 840 E DUNNE AVE              | MORGAN HILL | 95037    |
| SAFEWAY PHARMACY #1891                    | 100 TENNANT STATION          | MORGAN HILL | 95037    |
| SAFEWAY PHARMACY #2815                    | 470 NORTH SANTA CRUZ AVE     | LOS GATOS   | 95032    |
| SAFEWAY PHARMACY #2900                    | 5760 COTTLE RD               | SAN JOSE    | 95123    |
| SAFEWAY PHARMACY #4905                    | 6100 HELLYER AVE SUITE 100   | SAN JOSE    | 95138    |
| SAINT LOUISE REGIONAL HOSPITAL            | 9400 NO NAME UNO             | GILROY      | 95020    |
| SAMARITAN APOTHECARY PHARMACY             | 2505 SAMARITAN DR, SUITE 300 | SAN JOSE    | 95124    |
| SILICON VALLEY PHARMACY                   | 14107 M WINCHESTER BLVD      | LOS GATOS   | 95032    |
| STANFORD SOUTH BAY CANCER CENTER PHARMACY | 2589 SAMARTIAN DRIVE         | SAN JOSE    | 95124    |

| SITE NAME  | ADDRESS                          | CITY        | ZIP CODE |
|--|----------------------------------|-------------|----------|
| WAL-MART PHARMACY 10-2002                            | 7150 CAMINO ARROYO               | GILROY      | 95020    |
| WAL-MART PHARMACY 10-2524                            | 5502 MONTEREY HWY                | SAN JOSE    | 95138    |
| WAL-MART PHARMACY 10-5766                            | 170 COCHRANE PLAZA               | MORGAN HILL | 95037    |
| WALGREENS #02739                                     | 440 BLOSSOM HILL                 | SAN JOSE    | 95123    |
| WALGREENS #02786                                     | 14100 BLOSSOM HILL RD            | LOS GATOS   | 95032    |
| WALGREENS #03378                                     | 1376 KOOSER ROAD                 | SAN JOSE    | 95118    |
| WALGREENS #04516                                     | 745 E DUNNE AVE                  | MORGAN HILL | 95037    |
| WALGREENS #07326                                     | 423 N SANTA CRUZ AVE             | LOS GATOS   | 95030    |
| WALGREENS #09516                                     | 770 1ST ST                       | GILROY      | 95020    |
| BAY PHARMACY   | 200 JOSE FIGUERES AVE #235       | SAN JOSE    | 95116    |
| BETTER HEALTH PHARMACY                               | 725 E SANTA CLARA ST. SUITE #202 | SAN JOSE    | 95112    |
| CAPITOL PHARMACY                                     | 2114 SENTER ROAD                 | SAN JOSE    | 95112    |
| CHAU PHARMACY  | 2559 SOUTH KING ROAD SUITE 10    | SAN JOSE    | 95122    |
| COSTCO PHARMACY #148                                 | 2201 SENTER ROAD                 | SAN JOSE    | 95112    |
| DO RX PHARMACY                                       | 12 SOUTH 14TH STREET             | SAN JOSE    | 95112    |
| DOWNTOWN PHARMACY                                    | 60 N 13TH ST STE A               | SAN JOSE    | 95112    |
| FRIENDLY #2 PHARMACY                                 | 639 TULLY RD STE A               | SAN JOSE    | 95111    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17100 | 1750 STORY RD                    | SAN JOSE    | 95122    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17176 | 533 COLEMAN AVE                  | SAN JOSE    | 95110    |

| SITE NAME  | ADDRESS                      | CITY          | ZIP CODE |
|--|------------------------------|---------------|----------|
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17314 | 3155 SILVER CREEK RD         | SAN JOSE      | 95121    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17355 | 2161 MONTEREY HWY            | SAN JOSE      | 95125    |
| LEXANN PHARMACY INC                                  | 1569 LEXANN DR UNIT 104      | SAN JOSE      | 95121    |
| LINDA RX PHARMACY INC                                | 1569 LEXANN DR STE 130       | SAN JOSE      | 95121    |
| LION PHARMACY INC                                    | 2857 SENTER RD. SUTIE A      | SAN JOSE      | 95111    |
| LUCKY #758   | 565 W CAPITOL EXPRESSWAY     | SAN JOSE      | 95136    |
| MC KEE MEDICAL PHARMACY                              | 2350 MC KEE ROAD #A3         | SAN JOSE      | 95116    |
| MEGA DRUGS LLC                                       | 696 E SANTA CLARA ST STE 111 | SAN JOSE      | 95112    |
| PHARMERICA   | 145 E DANA ST STE B          | MOUNTAIN VIEW | 94041    |
| PRESCRIPTION HEADQUARTERS INC                        | 1340 TULLY RD STE 312        | SAN JOSE      | 95122    |
| REGIONAL MED CENTER OF SAN JOSE INP PHARMACY         | 225 N JACKSON AVE            | SAN JOSE      | 95116    |
| RITE AID 5985  | 1029 E CAPITOL EXPRESSWAY    | SAN JOSE      | 95121    |
| RITE AID 5991  | 3055 MC KEE ROAD             | SAN JOSE      | 95127    |
| RITE AID 5992  | 1030 S WHITE ROAD            | SAN JOSE      | 95127    |
| SAFEWAY PHARMACY #0316                               | 179 BRANHAM LANE             | SAN JOSE      | 95136    |
| SAFEWAY PHARMACY #0987                               | 17711 E. CAPITOL EXPRESSWAY  | SAN JOSE      | 95121    |
| ST JAMES HEALTH CENTER PHARMACY                      | 55 E JULIAN STREET           | SAN JOSE      | 95112    |
| STUDENT HEALTH SERVICES                              | ONE WASHINGTON SQUARE        | SAN JOSE      | 95192    |
| TULLY MEDICAL CLINIC PHARMACY                        | 1693 FLANIGAN DR STE 104     | SAN JOSE      | 95121    |
| TROPICANA DRUGS                                      | 1167 S KING ROAD             | SAN JOSE      | 95122    |

| SITE NAME  | ADDRESS                       | CITY       | ZIP CODE |
|--|-------------------------------|------------|----------|
| WALGREENS #01179                                     | 1795 E CAPITOL EXP            | SAN JOSE   | 95121    |
| WALGREENS #02081                                     | 1760 STORY ROAD               | SAN JOSE   | 95122    |
| WALGREENS #02265                                     | 1130 BIRD AVE                 | SAN JOSE   | 95125    |
| WALGREENS #04372                                     | 780 E SANTA CLARA STREET      | SAN JOSE   | 95112    |
| WALGREENS #05219                                     | 5 S 1ST STREET                | SAN JOSE   | 95113    |
| WALGREENS #05454                                     | 1661 MCKEE RD                 | SAN JOSE   | 95116    |
| WALMART PHARMACY #10-5435                            | 777 STORY RD                  | SAN JOSE   | 95122    |
| WALMART PHARMACY 10-4174                             | 1450 MONTEREY RD              | SAN JOSE   | 95112    |
| ABORN PHARMACY                                       | 2060 ABORN ROAD SUITE 150 B   | SAN JOSE   | 95121    |
| CARDINAL HEALTH 414,LLC                              | 1410 KOLL CIRCLE              | SAN JOSE   | 95112    |
| COSTCO PHARMACY #1004                                | 1709 AUTOMATION PKWY          | SAN JOSE   | 95131    |
| COSTCO PHARMACY #423                                 | 150 LAWRENCE STATION ROAD     | SUNNYVAL E | 94086    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17582 | 95 HOLGER WAY                 | SAN JOSE   | 95134    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17583 | 298 W MC KINLEY AVE           | SUNNYVAL E | 94086    |
| GE HEALTHCARE  | 1283 MTN VIEW-ALVISO RD STE B | SUNNYVAL E | 94089    |
| LIFE CONNECTIONS HEALTH CENTER PHARMACY              | 3571 N 1ST ST SUITE 201       | SAN JOSE   | 95134    |
| LUCKY #780   | 484 N MATHILDA AVE            | SUNNYVAL E | 94086    |
| LUCKY PHARMACY # 233                                 | 3457 MCKEE ROAD               | SAN JOSE   | 95127    |

| SITE NAME                     | ADDRESS                                  | CITY          | ZIP CODE |
|-------------------------------|--|---------------|----------|
| RITE AID 5895                 | 777 E EL CAMINO REAL                     | SUNNYVAL<br>E | 94087    |
| RITE AID 5973                 | 1350 SOUTH PARK VICTORIA<br>DRIVE        | MILPITAS      | 95035    |
| SAFEWAY PHARMACY #1196        | 639 S BERNARDO AVE                       | SUNNYVAL<br>E | 94087    |
| SAFEWAY PHARMACY #1439        | 785 E EL CAMINO REAL                     | SUNNYVAL<br>E | 94087    |
| SAFEWAY PHARMACY #1879        | 555 E CALAVERAS BLVD                     | MILPITAS      | 95035    |
| SAFEWAY PHARMACY #2887        | 150 E EL CAMINO REAL                     | SUNNYVAL<br>E | 94087    |
| SAFEWAY PHARMACY #3095        | 2980 E CAPITAL EXPRESSWAY                | SAN JOSE      | 95148    |
| SAVE MART PHARMACY #202 (CVS) | 3251 SOUTH WHITE ROAD                    | SAN JOSE      | 95148    |
| TRI-CITY PHARMACY             | 1132 CADILLAC CT                         | MILPITAS      | 95035    |
| WAL- MART PHARMACY 10 2119    | 301 RANCH DRIVE                          | MILPITAS      | 95035    |
| WAL-MART PHARMACY 10-3023     | 4055 EVERGREEN VILLAGE<br>SQUARE STE 140 | SAN JOSE      | 95135    |
| WALGREENS #00842              | 350 N CAPITOL AVE                        | SAN JOSE      | 95133    |
| WALGREENS #00900              | 2105 MORRILL AVE                         | SAN JOSE      | 95132    |
| WALGREENS #03445              | 2799 S WHITE RD                          | SAN JOSE      | 95148    |
| WALGREENS #03671              | 342 W CALAVERAS BLVD                     | MILPITAS      | 95035    |
| WALGREENS #05480              | 1833 N MILPITAS BLVD                     | MILPITAS      | 95035    |
| WALGREENS #07080              | 105 EAST EL CAMINO REAL                  | SUNNYVAL<br>E | 94087    |
| CAMDEN PHARMACY               | 3189 S BASCOM AVE                        | CAMPBELL      | 95008    |
| COSTCO PHARMACY #470          | 5301 ALMADEN EXPRESSWAY                  | SAN JOSE      | 95118    |

| SITE NAME  | ADDRESS                      | CITY        | ZIP CODE |
|--|------------------------------|-------------|----------|
| COSTCO PHARMACY 129                                  | 1601 COLEMAN AVENUE          | SANTA CLARA | 95050    |
| DIRECT MEDS PHARMACY                                 | 281 E HAMILTON AVE.          | CAMPBELL    | 95008    |
| ENBORG LANE PHARMACY                                 | 2221 ENBORG LANE STE 1J018   | SAN JOSE    | 95128    |
| FOREST AVENUE PHARMACY                               | 2039 FOREST AVENUE SUITE 202 | SAN JOSE    | 95128    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 16115 | 1811 HILLSDALE AVE           | SAN JOSE    | 95124    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 16763 | 1600 SARATOGA AVE            | SAN JOSE    | 95129    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 17658 | 2004 EL CAMINO REAL          | SANTA CLARA | 95050    |
| HAN'S PHARMACY                                       | 3423 EL CAMINO REAL          | SANTA CLARA | 95051    |
| LUCKY #757   | 2027 CAMDEN AVE              | SAN JOSE    | 95124    |
| LUCKY #761   | 200 EL PASEO DE SARATOGA     | SAN JOSE    | 95130    |
| LUCKY #773   | 3705 EL CAMINO REAL          | SANTA CLARA | 95051    |
| MED-PLACE PHARMACY                                   | 2101 FOREST AVE STE 122      | SAN JOSE    | 95128    |
| O'CONNOR HOSPITAL                                    | 2105 FOREST AVE              | SAN JOSE    | 95128    |
| RITE AID #5987                                       | 3171 MERIDIAN AVENUE         | SAN JOSE    | 95124    |
| RITE AID 5976  | 2620 EL CAMINO REAL          | SANTA CLARA | 95051    |
| RITE AID 5988  | 1550 HAMILTON AVE            | SAN JOSE    | 95125    |
| RITE AID 5993  | 1333 SOUTH WINCHESTER BLVD   | SAN JOSE    | 95128    |
| SAFEWAY PHARMACY #1293                               | 2341 S. WINCHESTER BLVD      | CAMPBELL    | 95008    |

| SITE NAME                               | ADDRESS                    | CITY        | ZIP CODE |
|---|----------------------------|-------------|----------|
| SAFEWAY PHARMACY #1465                  | 5146 STEVENS CREEK BLVD    | SAN JOSE    | 95128    |
| SAFEWAY PHARMACY #1476                  | 1300 W SAN CARLOS ST       | SAN JOSE    | 95126    |
| SAFEWAY PHARMACY #1483                  | 1530 HAMILTON AVE          | SAN JOSE    | 95125    |
| SAFEWAY PHARMACY #1990                  | 3970 RIVERMARK PLAZA       | SANTA CLARA | 95054    |
| SAFEWAY PHARMACY #3241                  | 950 W. HAMILTON AVE        | CAMPBELL    | 95008    |
| SANTA CLARA DRUG "THE COMPOUNDING SHOP" | 2453 FOREST AVE            | SAN JOSE    | 95128    |
| SAV-CO GENERIC DRUGS                    | 621 E CAMPBELL AVE, STE 1  | CAMPBELL    | 95008    |
| SCVH & HS REFILL CENTER PHARMACY        | 871 ENBORG CT UNIT 200     | SAN JOSE    | 95128    |
| WAL-MART PHARMACY 10-3025               | 1600 SARATOGA AVE UNIT 501 | SAN JOSE    | 95129    |
| WAL-MART STORES 10-5884                 | 5095 ALMADEN EXPY          | SAN JOSE    | 95118    |
| WALGREENS #00840                        | 1334 SARATOGA AVE          | SAN JOSE    | 95129    |
| WALGREENS #02384                        | 2680 UNION AVE             | SAN JOSE    | 95124    |
| WALGREENS #02612                        | 200 N WINCHESTER           | SANTA CLARA | 95051    |
| WALGREENS #02740                        | 3460 EL CAMINO REAL        | SANTA CLARA | 95051    |
| WALGREENS #02957                        | 1660 WINCHESTER BLVD       | CAMPBELL    | 95008    |
| WALGREENS #03754                        | 1399 W SAN CARLOS          | SAN JOSE    | 95126    |
| WALGREENS #06585                        | 1570 W CAMPBELL AVE        | CAMPBELL    | 95008    |
| WALGREENS #07079                        | 1615 MERIDIAN AVE          | SAN JOSE    | 95125    |
| WALGREENS #12548                        | 1130 FOXWORTHY AVE         | SAN JOSE    | 95118    |
| WALGREENS #15246                        | 2140 EL CAMINO REAL        | SANTA CLARA | 95050    |

| SITE NAME  | ADDRESS                      | CITY          | ZIP CODE |
|--|------------------------------|---------------|----------|
| WALMART PHARMACY 10-2486                             | 4080 STEVENS CREEK BLVD      | SAN JOSE      | 95129    |
| WALMART PHARMACY 10-3123                             | 3255 MISSION COLLEGE BLVD    | SANTA CLARA   | 95054    |
| CAMINO PHARMACY                                      | 701 E EL CAMINO REAL         | MOUNTAIN VIEW | 94040    |
| COSTCO PHARMACY 143                                  | 1000 NORTH RENGSTORFF AVENUE | MOUNTAIN VIEW | 94043    |
| DISCO REX, A WALGREENS SPECIALTY PHARMACY            | 328 UNIVERSITY AVE           | PALO ALTO     | 94301    |
| EL CAMINO HOSPITAL CANCER CENTER                     | 2505 HOSPITAL DR.            | MOUNTAIN VIEW | 94040    |
| EL CAMINO HOSPITAL PHARMACY                          | 2500 GRANT ROAD              | MOUNTAIN VIEW | 94040    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 16113 | 555 SHOWERS DR               | MOUNTAIN VIEW | 94040    |
| GARFIELD BEACH CVS LLC D/B/A TARGET PHARMACY # 16114 | 20745 STEVENS CREEK BLVD     | CUPERTINO     | 95014    |
| KML PHARMACY INC                                     | 1655 S DE ANZA BLVD #2       | CUPERTINO     | 95014    |
| LUCILE PACKARD CHILDREN'S HOSPITAL                   | 2500 GRANT RD RM 4C226       | MOUNTAIN VIEW | 94040    |
| LUCILE SALTER PACKARD CHILDRENS HSP                  | 725 WELCH ROAD               | PALO ALTO     | 94304    |
| LUCKY #723   | 2175 GRANT AVE               | LOS ALTOS     | 94022    |
| MEDICAL PLAZA PHARMACY                               | 211 QUARRY ROAD SUITE 108    | PALO ALTO     | 94304    |
| NOWRX  | 2224 OLD MIDDLEFIELD WAY     | MOUNTAIN VIEW | 94043    |
| PALO ALTO MEDICAL FOUNDATION PHARMACY                | 795 EL CAMINO REAL           | PALO ALTO     | 94301    |

| SITE NAME                                       | ADDRESS                                 | CITY             | ZIP CODE |
|---|---|------------------|----------|
| PETNET PHARMACEUTICAL                           | 3801 MIRANDA AVE DRC BLDG<br>102 RM 125 | PALO ALTO        | 94304    |
| PHARMACA INTEGRATIVE PHARMACY                   | 54 N SANTA CRUZ AVE                     | LOS GATOS        | 95030    |
| RITE AID 5886                                   | 2310 HOMESTEAD RD STE A                 | LOS ALTOS        | 94024    |
| RITE AID 5967                                   | 20572 HOMESTEAD ROAD                    | CUPERTINO        | 95014    |
| RITE AID 5994                                   | 6164 BOLLINGER ROAD                     | SAN JOSE         | 95129    |
| SAFEWAY PHARMACY #0705                          | 570 SHORELINE BLVD                      | MOUNTAIN<br>VIEW | 94043    |
| SAFEWAY PHARMACY #1682                          | 2811 MIDDLEFIELD RD                     | PALO ALTO        | 94306    |
| SAFEWAY PHARMACY #2814                          | 160 FIRST STREET                        | LOS ALTOS        | 94022    |
| SAFEWAY PHARMACY #2948                          | 645 SAN ANTONIO RD                      | MOUNTAIN<br>VIEW | 94040    |
| SAFEWAY PHARMACY #3251                          | 20620 HOMESTEAD RD                      | CUPERTINO        | 95014    |
| SAFEWAY PHARMACY #4526                          | 255 SECOND STREET                       | LOS ALTOS        | 94022    |
| STANFORD HEALTH CARE                            | 300 PASTEUR DRIVE RM H0301              | STANFORD         | 94305    |
| STANFORD HEALTH CARE                            | 875 BLAKE WILBUR RD                     | STANFORD         | 94305    |
| STANFORD NEUROSCIENCE HEALTH<br>CENTER PHARMACY | 213 QUARRY ROAD, ROOM<br>#2726          | STANFORD         | 94305    |
| STANFORD UNIV STUDENT HEALTH CTR<br>PHY         | 866 CAMPUS DR                           | STANFORD         | 94305    |
| WALGREENS #00689                                | 121 E EL CAMINO REAL                    | MOUNTAIN<br>VIEW | 94040    |
| WALGREENS #02147                                | 875 BLAKE WILBUR DR SUITE<br>CC 1101    | PALO ALTO        | 94304    |
| WALGREENS #02659                                | 112 RENGSTORFF                          | MOUNTAIN<br>VIEW | 94043    |

| SITE NAME                | ADDRESS               | CITY             | ZIP CODE |
|--------------------------|-----------------------|------------------|----------|
| WALGREENS #03344         | 4170 EL CAMINO REAL   | PALO ALTO        | 94306    |
| WALGREENS #03380         | 1306 S MARY AVE #66   | SUNNYVAL<br>E    | 94087    |
| WALGREENS #04416         | 20011 BOLLINGER ROAD  | CUPERTINO        | 95014    |
| WALGREENS #06869         | 2605 MIDDLEFIELD ROAD | PALO ALTO        | 94306    |
| WALGREENS #07088         | 303 2ND STREET        | LOS ALTOS        | 94022    |
| WALGREENS #09782         | 780 E EL CAMINO REAL  | SUNNYVAL<br>E    | 94087    |
| WALGREENS #13596         | 300 UNIVERSITY AVE    | PALO ALTO        | 94301    |
| WALGREENS #13948         | 1905 W EL CAMINO REAL | MOUNTAIN<br>VIEW | 94040    |
| WALMART PHARMACY 10 2280 | 600 SHOWERS DRIVE     | MOUNTAIN<br>VIEW | 94040    |

# Appendix E

## Kiosk Prototype and Sample Signage



## Sample Kiosk Signage

### Front Panel Kiosk Art

# MEDICINE DISPOSAL

ELIMINACIÓN DE MEDICAMENTOS · 藥品棄置  
PAGTATAPON NG GAMOT · THẢI BỎ THUỐC  
दवाओं का नपितान · 医薬品の廃棄 · 의약품 폐기

# SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES



**1** Cross out or remove personal identifying information from the medicine bottle.



**2** Leave the product in its original container or place solid medicines in a sealed plastic bag.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*



**3** Put medicine in the kiosk.

ONLY SCHEDULE II-V CONTROLLED AND NON-CONTROLLED SUBSTANCES THAT ARE LAWFULLY POSSESSED BY THE ULTIMATE USER ARE ACCEPTABLE TO BE PLACED IN THE KIOSK. SCHEDULE I CONTROLLED SUBSTANCES, ILLICIT OR DANGEROUS SUBSTANCES, AND ANY CONTROLLED SUBSTANCES NOT LAWFULLY POSSESSED BY THE ULTIMATE USER MAY NOT BE PLACED IN THE KIOSK.

PROP 65 WARNING: Entering this area, or coming into contact with items or materials in this kiosk, may expose you to chemicals known to the State of California to cause cancer, birth defects, reproductive toxicity and/or other reproductive harm.

For more information about the MED-Project program, please go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-PROJECT.

**MED-Project**<sup>TM</sup>  
Medication Education & Disposal

Sample Kiosk Signage

Side Panel Kiosk Art

**MEDICINE DISPOSAL**

ELIMINACIÓN DE MEDICAMENTOS • दवाओं का नष्टान • 医薬品の廃棄  
PAGTATAPON NG GAMOT • 의약품 폐기 • THẢI BỎ THUỐC • 藥品棄置

**SAFELY  
DISPOSE OF  
UNWANTED & EXPIRED  
MEDICINES**



MED-Project Call Center: 1 844 MED-PROJECT  
[www.med-project.org](http://www.med-project.org)

**MED-Project**<sup>TM</sup>

Medication Education & Disposal

## Sample Kiosk Signage

### Drop-Slot Kiosk Art



**ACCEPTED:** MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.



**NOT ACCEPTED:** HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT-DRUGS.

Name: 123 Pharmacy

Contact: (555) 555-5555

Sample Kiosk Drop-Off Site Signage

**SAFELY**  
**DISPOSE OF**  
UNWANTED & EXPIRED  
**MEDICINES**  
**HERE**

**MED-Project**<sup>TM</sup>

Medication Education & Disposal

## Sample Mail-Back Services Signage

**MED-Project™**  
Medication Education & Disposal



**MAIL-BACK SERVICES ARE AVAILABLE IN YOUR AREA FOR:**  
**HAY SERVICIOS DE DEVOLUCIÓN POR CORREO DISPONIBLES EN SU ZONA PARA:**

在您所在地區提供的 寄回服務包括：

**AVAILABLE ANG MGA SERBISYO NG MAIL-BACK SA IYONG LUGAR PARA SA:**

आपके क्षेत्र में मेल-बैक सेवाएँ निम्न के लिए उपलब्ध हैं:

お住まいの地域では、下記製品に郵送での返却サービスがご利用いただけます:

거주하고 계신 지역에서는 다음 품목에 대한 반송 서비스가 가능합니다.

**CÓ SẴN DỊCH VỤ GỬI TRẢ Ở KHU VỰC CỦA BẠN CHO:**



**INJECTORS**  
**INYECTORES**

注射器

**MGA PANG-INIKSYON**

इंजेक्टर्स

注射器

주사기

**DỤNG CỤ TIÊM**

For more information, please call or visit our website

Para obtener más información, por favor llame o visite nuestro sitio web

欲了解更多信息，請致電或访问我们的网站

Para sa higit pang impormasyon, mangyaring tawagan o bisitahin ang aming website

अधिक जानकारी के लिए, कृपया कॉल करें या हमारी वेबसाइट पर जाएँ

詳しくはお電話でお問い合わせいただくか、ウェブサイトをご覧ください。

자세한 사항은 전화로 문의하시거나 저희 웹사이트를 통해 확인하십시오.

Để biết thêm thông tin, vui lòng gọi hoặc truy cập trang web của chúng tôi

1-844-MED-PROJECT/www.med-project.org

*This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.*

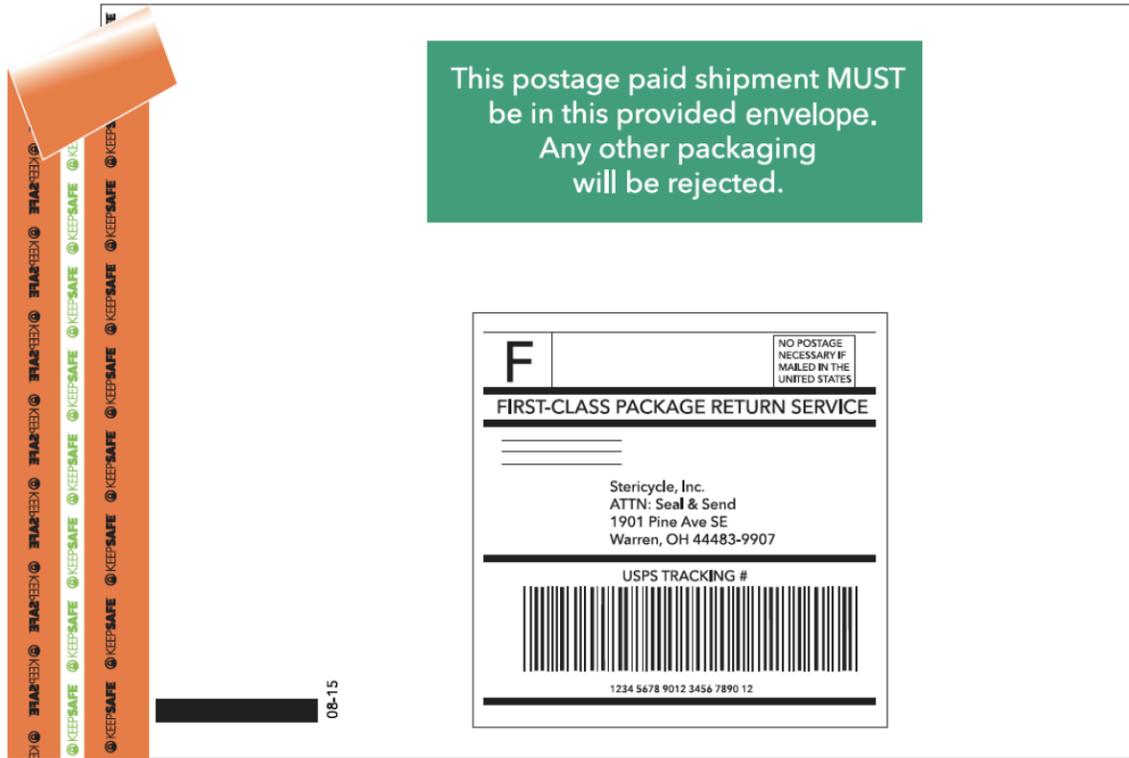
Sample Mail-Back Distribution Location Signage

**MAIL-BACK**  
**PACKAGES FOR**  
**UNWANTED & EXPIRED**  
**MEDICINES**  
**AVAILABLE**  
**HERE**

**MED-Project**<sup>™</sup>  
Medication Education & Disposal

# Appendix F

## Sample Standard Mail-Back Package



### Description:

Plastic envelope with return label, instructional flyer, and unique identifier enabling tracking from collection through final disposal.

### Package Size:

Outer dimensions: 8.25" x 12"; inner dimensions: 7.375" x 10.375"; 2" flap with tamper-evident hot melt tape,

Return label: 4" x 4"

Instructional sheet: 5" x 7"

MED-Project may choose to change its Vendor for Mail-Back Services at any time, subject to requirements in the Ordinance and Regulations.

## Appendix G

### Sample Injector Mail-Back Package



#### Description:

Injector Mail-Back Package including FDA-cleared sharps container with mail-back system, return label, instructional flyer, and unique identifier enabling tracking from collection through final disposal.

#### Package Size:

1.4 quart and/or 1.2-gallon mail-back system

PureWay Compliance Inc. mail-back solutions are an example of complete, turnkey systems to provide for the safe return of Pre-filled Injector Products through the United States Postal Service. All PureWay Compliance Inc. solutions are tested and permitted to USPS specifications as outlined in USPS Publication 52.

MED-Project may choose to change its Vendor for Mail-Back Services at any time, subject to requirements in the Ordinance and Regulations.

## Appendix H

### Sample PureWay Inhaler Mail-Back Package Description



**Description:**

Inhaler Mail-Back Package including container with mail-back system, return label, instructional flyer, and unique identifier enabling tracking from collection through final disposal.

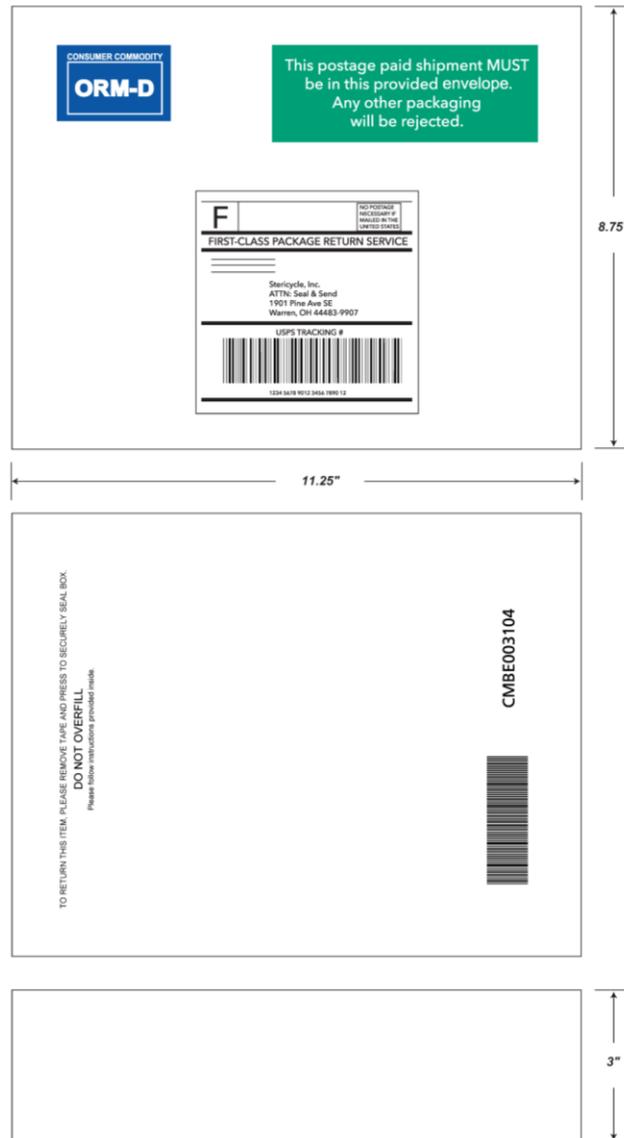
**Package Size:**

2.5-gallon mail-back system

PureWay Compliance Inc. mail-back solutions are an example of complete, turnkey systems to provide for the return of inhaler waste through Carrier.

MED-Project may choose to change its Vendor for Mail-Back Services at any time, subject to requirements in the Ordinance and Regulations.

## Sample Stericycle Inhaler Mail-Back Package



### Description:

Inhaler Mail-Back Package including container with mail-back system, return label, and instructional flyer.

### Package Sizes:

Outer dimensions: 8.75"x 11.25"x 3"

Mail-back solutions are an example of complete, turnkey systems to provide for the safe return of inhaler waste through Carrier.

MED-Project may choose to change its Vendor for Mail-Back Services at any time, subject to requirements in the Ordinance and Regulations.

## Appendix I

### A. Stericycle, Inc., Indianapolis, Indiana Facility Penalty Record

| DATE      | TYPE | SUMMARY                      | VIOLATION DETAIL   | RETURN TO COMPLIANCE | CORRECTIVE ACTION  |
|-----------|------|------------------------------|--|----------------------|--|
| 6/15/2017 | RCRA | Inventory weight discrepancy | Discrepancy on the haz waste inventory log   | 6/15/2017            | Violation corrected during audit, no further action required                                 |
| 3/29/2017 | RCRA | Inventory weight discrepancy | Discrepancy on the haz waste inventory log   | 3/29/2017            | Violation corrected during audit, no further action required                                 |
| 3/29/2017 | RCRA | Hazardous waste labeling     | Containers missing date  | 3/29/2017            | Violation corrected during audit, no further action required                                 |
| 7/25/2016 | RCRA | Inventory dates              | Inventory dates and physical dates on containers did not match   | 10/25/2016           | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |
| 7/17/2015 | RCRA | Hazardous waste labeling     | Unlabeled universal waste pallets  | 11/17/2015           | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |
| 7/17/2015 | RCRA | Contingency Plan             | Contingency Plan list of emergency coordinators not updated with current contact information   | 11/17/2015           | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |
| 7/31/2014 | RCRA | Inventory weight discrepancy | Discrepancies regarding the quantity (weight) of waste stored in permitted areas compared to the weights listed on the physical containers | 9/8/2014             | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |

| DATE      | TYPE | SUMMARY   | VIOLATION DETAIL   | RETURN TO COMPLIANCE | CORRECTIVE ACTION  |
|-----------|------|---|--|----------------------|--|
| 6/5/2014  | Air  | Annual report not submitted   | Did not submit Annual Compliance Certification for period covering 1/1/13 to 12/31/13  | 6/9/2014             | Report submitted to IDEM; issue closed with Return to Compliance Letter                      |
| 3/26/2014 | RCRA | Satellite Accumulation violation  | Two containers exceeded the 3-day limit for moving satellite accumulation area to the container storage area                               | 6/17/2014            | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |
| 3/26/2014 | RCRA | Inventory weight discrepancy  | Discrepancies regarding the quantity (weight) of waste stored in permitted areas compared to the weights listed on the physical containers | 6/17/2014            | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |
| 3/26/2014 | RCRA | Container storage   | One container of hazardous waste located outside of the permitted area   | 6/17/2014            | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |
| 6/28/2013 | RCRA | Satellite Accumulation/Waste Accumulation Labeling; Inventory Log discrepancy | Missing satellite accumulation and UW label; Missing Accumulation Date and Waste Type; Discrepancy on container storage locations          | 10/16/2013           | Responded to IDEM with corrective action plan; issue closed with Return to Compliance Letter |

### B. Veolia – Port Arthur Penalty Record

| Inspection Date | Type of inspection | Name of inspector and Regulatory Agency | Alleged Violations  | VEOLIA Responses and/or Corrective Actions Taken   |
|-----------------|--------------------|---|---|--|
| 3/9/2017        | CAA                | TCEQ                                    | <ol style="list-style-type: none"> <li>1) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour at the incinerator.</li> <li>2) Failure to maintain Carbon Monoxide emissions of 100 parts per million by volume (ppmv) at the incinerator.</li> <li>3) Failure to maintain incinerator minimum combustion temperatures.</li> <li>4) Failure to maintain Arsenic and Chromium emission rates at the Incinerator.</li> <li>5) Failure to maintain combined Cadmium-Lead and combined Arsenic-Beryllium-Chromium emissions at the Incinerator.</li> <li>6) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour during start-up at the Incinerator.</li> </ol> | <p>4/18/2017: Received NOV.</p> <p>5/27/2017: Submitted Corrective Action Plan.</p> <p>9/29/2017: Received a letter from the TCEQ stating adequate compliance documentation was received and no further action required.</p> |
| 5/16/2016       | RCRA               | TCEQ                                    | <ol style="list-style-type: none"> <li>1) Failure to maintain hazardous waste tanks inspection records.</li> <li>2) Failure to maintain a current NOR status of INACTIVE for hazardous waste tanks inspection records.</li> <li>3) Failure to include on the emergency equipment list, One</li> </ol>   | <p>7/26/2016: Received NOV.</p> <p>8/25/2016: Submitted Corrective Action Response.</p> <p>3/1/2017: Received a letter from the TCEQ stating no further action required.</p>   |

| Inspection Date | Type of inspection  | Name of inspector and Regulatory Agency | Alleged Violations   | VEOLIA Responses and/or Corrective Actions Taken  |
|-----------------|---------------------|---|--|---|
|                 |                     |   | <p>Self Contained Breathing Apparatus (SCBA) located at the onsite Response Office.</p> <p>4) Failure to have legible posted signs with the legend Danger-Unauthorized Personnel Keep Out.</p> <p>5) Failure to have adequate security to prevent unknowing site entry.</p>  |   |
| 1/26/2016       | CAA Title V/NSR Air | TCEQ                                    | <p>1) Failure to maintain the Carbon Monoxide emission rate of 17.10 pounds per hour at the Incinerator.</p> <p>2) Failure to maintain Carbon Monoxide emissions of 100 parts per million by volume (ppmv) at the Incinerator.</p> <p>3) Failure to maintain Incinerator minimum combustion temperatures.</p> <p>4) Failure to maintain Arsenic, Beryllium, Cadmium, Chromium and Nickel emission rates at the Incinerator.</p> <p>5) Failure to maintain combined Cadmium-Lead and combined Arsenic-Beryllium-Chromium emissions at the Incinerator.</p> <p>6) Failure to prevent visible emissions at Tank T102.</p> | <p>4/27/2016: Received NOV from the TCEQ</p> <p>6/3/2016: Submitted a response to the TCEQ.</p> <p>9/20/2016: Received a letter from the TCEQ stating no further action required.</p> |

| Inspection Date | Type of inspection | Name of inspector and Regulatory Agency | Alleged Violations   | VEOLIA Responses and/or Corrective Actions Taken  |
|-----------------|--------------------|---|--|---|
|                 |                    |   | 7) Failure to make a first attempt at repair no later than 5 days after a leak is detected and failed to repair a leak no later than 15 days after a leak is detected.   |   |
| 4/22/2015       | TPDES              | TCEQ                                    | <ol style="list-style-type: none"> <li>1) Failure to collect ammonia-nitrogen sample at the frequency specified in the Water Quality Discharge Permit for Outfall 001.</li> <li>2) Failure to comply with test procedures specified in 30 TAC 319.11-319.12.</li> <li>3) Failure to properly calculate the daily average for E. coli.</li> <li>4) Failure to correctly report effluent data on the discharge monitoring report.</li> </ol> | <p>5/20/2015: Submitted a response to TCEQ</p> <p>6/10/2015: Received a letter from the TCEQ stating no further action is required.</p>   |
| 1/30/2015       | Drinking Water     | TCEQ                                    | <ol style="list-style-type: none"> <li>1) Received NOV for failure to Provide or Report Public Notice.</li> </ol>  | <p>2/20/2015: Submitted a response to TCEQ.</p> <p>12/31/2015: No further correspondence received.</p>  |
| 1/16/2015       | Drinking Water     | TCEQ                                    | <ol style="list-style-type: none"> <li>1) Failure to have an accurate and up to date plant operations manual.</li> <li>2) Failure to inspect the interior of the 5,000-gallon pressure tank at least once every 5 years.</li> <li>3) Failure to notify TCEQ prior to making any significant change or</li> </ol>   | <p>5/29/2015: Submitted a response to TCEQ</p> <p>7/30/2015: Received a request from the TCEQ for additional information.</p> <p>11/3/2015: Submitted a response to TCEQ</p> <p>12/30/2015: Received a letter from the TCEQ</p> |

| Inspection Date | Type of inspection | Name of inspector and Regulatory Agency | Alleged Violations  | VEOLIA Responses and/or Corrective Actions Taken  |
|-----------------|--------------------|---|---|---|
|                 |                    |   | addition to the system's production, treatment, storage, pressure maintenance, or distribution facilities.<br>4) Failure to record the amount of chemicals used at least once a week.                               | stating the drinking water project was approved.  |
| 1/6/2015        | Air                | TCEQ                                    | 1) Failure to maintain the Carbon Monoxide emission rate at the Incinerator. For the period of April 4, 2014 through August 18, 2014.   | 3/6/2015: Submitted a response to the TCEQ.<br>6/24/2015: Received a letter from TCEQ stating no further action is required.  |
| 11/3/2014       | Drinking Water     | TCEQ                                    | Received an NOV for failure to submit Disinfectant Level Quarterly Operating Report.  |   |
| 9/26/2014       | RCRA               | TCEQ                                    | 1) Failure to document inspector's full name on daily inspection logs.<br>2) Failure to include a notation of the observations made during daily & weekly inspections   | 10/22/2014: Submitted Response to TCEQ.<br>2/9/2015: Received documentation stating no further action is required.  |
| 2/20/2013       | CAA                | TCEQ                                    | 1) Failure to maintain a minimum power of 15 Kilovolt Amps (KVA) to the Wet Electrostatic Precipitator (WESP) (EPN INCINSTK).<br>2) Failure to conduct the 4th quarter Cylinder Gas Audits on the Hydrogen Chloride | 5/24/2013: Submitted Response to TCEQ for Alleged Violations 1. and 2.<br>6/21/2013: Received letter from the TCEQ stating no further action is required for Alleged Violations 1. and 2. |

| Inspection Date | Type of inspection | Name of inspector and Regulatory Agency | Alleged Violations  | VEOLIA Responses and/or Corrective Actions Taken  |
|-----------------|--------------------|---|---|---|
|                 |                    |   | <p>(HCl) and Sulfur Dioxide (SO<sub>2</sub>) CWMS.</p> <p>3) Failure to maintain carbon monoxide emission rate at the Incinerator (EPN INCINSTK).</p> | <p>5/2/2013: Received Notice of Enforcement for Alleged Violation 3.</p> <p>9/12/2013: Received Revised Proposed Agreed Order Assessing Penalty</p> <p>9/16/2013: Submitted Payment of Penalty</p> <p>2/20/2014: Received Final Agreed Order</p> <p>3/25/2014: Submitted written certification and documents to demonstrate compliance.</p> <p>8/22/2014: Received Notice of Compliance with Agreed Order</p> |

### C. Heritage Thermal Services – Ohio Penalty Record

| TYPE OF ACTION                                | DATE      | ADDRESS   | REGULATORY BODY/AGENCY  | DESCRIPTION OF ALLEGED VIOLATION  | FINE AMOUNT | FINAL DISPOSITION   |
|---|-----------|---|---|---|-------------|---|
| NOV   | 5/26/17   |   | DAPC  | HTS exceeded THC 1-hr rolling average on March 25, 2017 (Title V).  | NA          | <b>Closed</b> – OEPA issued resolution of violation letter on 7/11/17.  |
| NOV   | 2/12/16   |   | OSHA  | Failure to ensure employee was wearing proper PPE.  | \$27,720    | <b>Closed</b> – HTS settled this matter on October 14, 2016.  |
| NOV   | 1/21/16   |   | DAPC  | HTS exceeded NOx 3hr block average on June 28, 2015 (Title V).  | NA          | <b>Closed</b> - NOV resolved in letter dated 02/25/16; HTS responded with action plan in a letter dated February 5, 2016. |
| <b>Director's Final Findings &amp; Orders</b> | 4/2/2015  | 1250 Saint George Street<br><br>East Liverpool, Ohio, 43920 | Ohio EPA ("OEPA"), Ohio Division of Air Pollution Control ("DAPC") and Ohio Division of Materials and Waste Management ("DMWM") | Notices of violation ("NOVs") issued to HTS due to the 7/13/13 Incident:<br><br>Dust Nuisance (DAPC)<br><br>Unlawful disposal of hazardous waste and improper maintenance and operation of equipment (DMWM) | \$34,000    | Heritage Thermal Services ("HTS") is in discussions with Ohio EPA   |
| <b>Finding of Violation</b>                   | 3/25/2015 | 1250 Saint George Street                                    | US EPA  | HTS exceeded Maximum Achievable Control   | TBD         | HTS is in discussions with US EPA   |

| TYPE OF ACTION | DATE      | ADDRESS   | REGULATORY BODY/AGENCY | DESCRIPTION OF ALLEGED VIOLATION   | FINE AMOUNT | FINAL DISPOSITION   |
|----------------|-----------|---|------------------------|--|-------------|---|
|                |           | East Liverpool, Ohio, 43920                             |                        | Technology (“MACT”) standard and Title V Operating Parameter Limits on several occasions.  |             |   |
| NOV            | 9/16/2014 | 1250 Saint George Street<br>East Liverpool, Ohio, 43920 | DMWM                   | Violation of Ohio Administrative Code (“OAC”) 3745-55-75(b)<br><br>Bulk waste container stored outside of secondary containment.               | NA          | <b>Closed</b> – Return to compliance (“RTC”) received in a letter dated December 8, 2014. September 16, 2014 letter acknowledged that issue had been corrected on date of inspection. |
| NOV            | 9/16/2014 | 1250 Saint George Street<br>East Liverpool, Ohio, 43920 | DMWM                   | Violation of OAC 3745-54-15(c)<br><br>Immediate action had not been taken to prevent further incident following discovery of equipment damage. | NA          | <b>Closed</b> – RTC received in a letter dated December 8, 2014, September 16, 2014 letter acknowledged that issue had been corrected on date of inspection.                          |
| NOV            | 9/16/2014 | 1250 Saint George Street<br>East Liverpool, Ohio, 43920 | DMWM                   | Violation of Permit Condition C.6(c)<br><br>Spills not cleaned up in a timely manner.  | NA          | <b>Closed</b> – RTC received in a letter dated December 8, 2014, September 16, 2014 letter acknowledged that issue had  |

| TYPE OF ACTION | DATE      | ADDRESS   | REGULATORY BODY/AGENCY                          | DESCRIPTION OF ALLEGED VIOLATION   | FINE AMOUNT | FINAL DISPOSITION   |
|----------------|-----------|---|---|--|-------------|---|
|                |           |   |   |  |             | been corrected on date of inspection.   |
| NOV            | 10/2/2013 | 1250 Saint George Street<br><br>East Liverpool, Ohio, 43920 | DMWM  | Ash release on 7/13/13 was an unlawful Disposal of Hazardous Waste.<br><br>Failure of proper Operation and Maintenance of equipment/facility | NA          | HTS responded in a letter dated October 21, 2013.<br><br>HTS met with OEPA on 9/22/14 to provide update.<br><br>HTS provided written update and request for RTC in letter dated 10/17/14.<br><br>HTS 2 <sup>nd</sup> request for RTC in letter dated 12/12/14.<br><br>HTS 3 <sup>rd</sup> request for RTC in letter dated 2/3/2015.<br><br>HTS has completed requirements for RTC and is actively pushing OEPA for RTC. |
| NOV            | 8/5/13    | 1250 Saint George Street<br><br>East Liverpool, Ohio, 43920 | Ohio Division of Air Pollution Control ("DAPC") | Ash release determined to be a public nuisance in violation of OAC 3745-15-07  | NA          | HTS responded in a letter dated August 22, 2013.<br><br>HTS met with OEPA on 9/22/14 to provide update.<br><br>HTS provided written update and request for RTC in letter dated 10/17/14.  |

| TYPE OF ACTION | DATE      | ADDRESS  | REGULATORY BODY/AGENCY | DESCRIPTION OF ALLEGED VIOLATION  | FINE AMOUNT | FINAL DISPOSITION   |
|----------------|-----------|--|------------------------|---|-------------|---|
|                |           |  |                        |   |             | <p>HTS 2<sup>nd</sup> request for RTC in letter dated 12/12/14.</p> <p>HTS 3<sup>rd</sup> request for RTC in letter dated 2/3/2015.</p> <p>HTS has completed requirements of RTC and is actively pushing OEPA for RTC.</p>  |
| NOV            | 6/21/2013 | <p>1250 Saint George Street</p> <p>East Liverpool, Ohio, 43920</p> | OSHA                   | Violation of various standards – decontamination, improper storage of water reactives, not identifying hazards. | \$11,802    | <p><b>Closed</b> – HTS settled this matter on 8/30/13.</p> <p>HTS and OSHA met for informal conference on 7/16/13.</p> <p>Agreement reached – citation 4 vacated, instances a and c for citation 3 vacated; rewording of citation 1 and 2. Penalty reduced to \$11,802.</p> |

## D. Clean Harbors Aragonite, LLC Enforcement Summary Fact Sheet

Clean Harbors Aragonite is subject to regulatory inspections by multiple agencies. While our goal is 100% compliance with all permits and regulatory requirements, inspections can result in alleged violations. This document is a summary from those inspections.

Although the company does not necessarily concur with these findings, consistent with the company's standard policy it has agreed to take all steps necessary to comply with the orders and to take such other corrective measures so as to ensure that the facility is in full compliance with its federal and state operating permits.

In 2015 the facility resolved a notice of violation with USDEA. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. Failure to maintain a current license required by the state of Utah. ***A former compliance manager did not renew one of two state licenses. This was discovered during an internal audit and self-reported to both Utah and DEA. The facility voluntarily discontinued acceptance of controlled substances until the permit was obtained.***
2. Failure to maintain separate biennial reports for Schedule I/II and III/IV/V controlled substances. ***The facility had zero inventory and reported that on one form. We disagreed with this allegation. If there was any inventory to report it would have been done on separate forms as required by the regulations.***
3. Failure to maintain complete and accurate records. ***Information was contained on Form 41's as required by regulation but would not fit in the column DEA considered appropriate. The facility began to use revised DEA form 41's (that includes more space) to address the issue.***

This was resolved by a consent order that included a \$63,000 penalty.

In 2015 the facility resolved a notice of violation with Utah Board of Pharmacy for the same issue as #1 above.

This was resolved by an administrative order that included a \$20,000 penalty.

In 2014 the facility resolved a notice of violation with USDEA. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. Failure to complete an accurate biennial inventory. ***The facility had zero inventory and reported that on a Clean Harbors letterhead. We disagreed with this violation. If there was any inventory to report it would have been done on forms as required by the regulations.***
2. Failure to document the number of items received and the date items were received on a copy 3 of DEA form 222. ***This information was documented on a transfer form but not copied to a form 222. Facility personnel were retrained to address the issue.***
3. Failure to execute a form 222 to transfer substances to another registered entity. A shipment count did not match and was rejected back to the generator. ***The facility did not include rejection using a form 222. Facility personnel were retrained to address the issue.***
4. Failure to report the required documents in ARCOS in a complete and accurate manner. ***We disagreed with this violation. All reports were submitted to ARCOS. There were several errors not yet corrected at the time of the inspection. All errors were subsequently corrected.***

This was resolved by a consent order that included a \$190,000 penalty.

In 2013 the facility resolved a notice of violation with UDEQ. This pertains to an annual RCRA inspection conducted in 2012. Alleged violations are listed below followed by the *facility response in bold italicized text*.

1. The facility self-reported a permit condition to record times each backup carbon adsorber is used was not followed. ***During an internal audit it was discovered a PLC that records backup carbon usage was rounding minutes incorrectly and slightly underreported usage. The programming was corrected.***
2. The facility self-reported that a water reactive labpack in excess of four liters was accepted and incinerated, in violation of permit conditions. ***The material is acceptable but not in excess of four liters per container. The person responsible for the mistake was disciplined.***
3. UDEQ alleged that weekly emergency shower and eyewash inspections were not noted in inspection tags. ***We disagreed with this violation. Inspections were performed and documented on an inspection log.***
4. UDEQ alleged that a leaking roof repair was not completed within 72 hours as required by permit. ***We disagreed with this violation. During a January storm, ice accumulated on a roof over Building E-2. Once it warmed above freezing a small leak was discovered. Due to the dangers of roofing contractors on frozen roofs, this was not repaired until May***
5. UDEQ alleged the facility did not report a fire as required by the permit. ***We disagreed with this violation. Heat tracing under pipe insulation shorted arced and melted wire insulation. There was not a fire and as such was not reportable.***
6. UDEQ alleged that a RCRA air subpart BB/CC database and associated drawings were not kept updated. ***The database was accurate but drawings were not current.***
7. UDEA alleged that an incoming container tested positive for oxidizers and that container should have been reclassified as a DOT oxidizer. ***We disagreed with this violation. The container held mixed acids, some of which do test positive for oxidizers. This was not an oxidizer per DOT standards.***
8. The facility self-reported that an inbound trailer was not offloaded within 10 days as required by permit. ***No comment. This was self-reported.***

This was resolved by a consent order that included a \$31,155 penalty.

In 2012 the facility resolved a notice of violation with UDEQ. This pertains to an annual RCRA inspection conducted in 2011. Alleged violations are listed below followed by the ***facility response in bold italicized text***.

1. UDEQ alleged there was a calibration problem with the oxygen analyzer in the hydrocarbon vent system. ***We disagreed with this violation. The facility inspection program found and corrected the problem prior to the inspection. This was corrected by installing a condensation trap and filter prior to the analyzer.***
2. The facility self-reported to UDEQ that the direct burn flow meter was incorrectly calibrated. ***This was immediately corrected when discovered.***
3. UDEQ alleged the facility did not properly describe a waste being accepted on the waste receiving report. ***We disagreed with this violation. The waste was profiled with a range (IE: yellow liquid 0-25%) so the waste received description can seem subjective compared to the profile.***
4. UDEQ alleged 2 drums of site generated waste were incinerated without burn chemistry documentation. ***The facility believes this was done but documentation could not be produced. Personnel involved were retrained.***
5. There were seven additional examples of improper burn chemistry documentation violations. ***To address the issues, the waste analysis plan was recently modified that will allow burn chemistry matrixes to be applied based on sampling and analysis of each waste stream. This information is documented in the operating record.***
6. UDEQ alleged the facility did not properly completed inspection logs. ***During this timeframe, a new electronic inspection log was implemented. One day the log would indicate an issue and the next***

*day it passed. The problem was attributed to a pop up warning that did not properly function. This was promptly corrected.*

7. UDEQ alleged that crack repairs to a secondary containment system was a violation. *We disagreed with this violation. The cracks were found during an inspection. They could not be repaired within 72 hours as required by permit due to weather. UDEQ was notified prior to 72 hours as required by the permit. The cracks were promptly repaired when the weather was dry and >50°F. (needed for the epoxy to cure)*
8. UDEQ alleged the facility did not report a fire as required by the permit. *We disagreed with this violation. A hose connected to a propane torch became disconnect causing an incidental fire. The permit requires any fire in an area where waste is managed to be reported. The fire did not meet reporting required by the permit.*
9. UDEQ alleged an instrument calibration log was not signed by the technician who did the calibration. *The person did not sign the log as required. He was retrained.*

This was resolved by a consent order that included a \$35,017 penalty.

In 2012 EPA issued a warning letter alleging seven instances of TRI reporting errors from 2007 through 2010. *These mistakes were made by a former employee who is no longer employed by Clean Harbors.*

This was resolved by a consent order that included a \$39,900 penalty.

Questions associated with this fact sheet should be directed to Mike Crisenbery, VP Compliance (513-823-2280).

### E. Daniels Sharpsmart Inc. Penalty Record

| DATE       | ADDRESS                                       | REGULATORY BODY/AGENCY                    | FINDING  |
|------------|---|---|--|
| 5/28/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Failed to provide tracking documents which show the name, address, and telephone number of the medical waste generator, for purpose of tracking the generator medical waste when the waste is transported to the final medical waste treatment facility.   |
| 5/28/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.   |
| 5/28/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Tracking documents are not staying with the waste and are being signed off as treated by the office staff.   |
| 5/28/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Unregistered haulers are used to transport waste out of the state for incineration.  |
| 8/26/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Waste is not being held at 32°F or below.  |
| 8/26/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.   |
| 8/26/2014  | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | The facility shall immediately clean the ground around the treatment area to a well-maintained condition. Any enclosure or designated accumulation area used for storage of medical waste prior to transportation or treatment shall provide medical waste protection from animals and natural elements and shall not provide a breeding place for insects or rodents. |
| 11/20/2014 | 4144<br>Therese                               | California Department<br>of Public Health | Failed to provide tracking documents which show the name, address, and telephone number of the medical   |

| DATE       | ADDRESS                                       | REGULATORY BODY/AGENCY                 | FINDING  |
|------------|---|--|--|
|            | Ave<br>Fresno, CA<br>93725                    |  | waste generator, for purpose of tracking the generator medical waste when the waste is transported to the final medical waste treatment facility.              |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | Waste is not being treated within the required timeframe.  |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition. |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | A new operations manual must be submitted within 30 days.  |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | Tracking documents are not staying with the waste and are being signed off as treated by the office staff.   |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | Unregistered haulers are used to transport waste out of the state for incineration.  |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | Not all incineration waste is being treated by incineration.   |
| 11/20/2014 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department of Public Health | Not all pathology waste is being treated in a mixture of 25% pathology and 75% biohazardous waste as required.   |
| 11/20/2014 | 4144<br>Therese<br>Ave                        | California Department of Public Health | Non-compliances with the conditions of the permit were not reported to the Department within 24 hours.   |

| DATE      | ADDRESS                                       | REGULATORY BODY/AGENCY                    | FINDING  |
|-----------|---|---|--|
|           | Fresno, CA<br>93725                           |   |  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Failed to provide tracking documents which show the name, address, and telephone number of the medical waste generator, for purpose of tracking the generator medical waste when the waste is transported to the final medical waste treatment facility. |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Waste is not being treated within the required timeframe.  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Waste is not being held at 32°F or below.  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Containers to be reused were not thoroughly washed and decontaminated by a method approved by the Department and maintained in a clean and sanitary condition.   |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Some waste containers are being compromised and pose an environmental risk.  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Some pharmaceutical waste containers, individual, secondary or the fiberboard boxes did not have the proper labeling.  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Autoclavable waste in the recycled sharps program was not treated within the required seven days.  |
| 4/10/2015 | 4144<br>Therese<br>Ave                        | California Department<br>of Public Health | Tracking documents are not staying with the waste and are being signed off as treated by the office staff.   |

| DATE      | ADDRESS                                       | REGULATORY BODY/AGENCY                    | FINDING   |
|-----------|---|---|---|
|           | Fresno, CA<br>93725                           |   |   |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Not all incineration waste is being treated by<br>incineration.   |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Not all pathology waste is being treated in a mixture of<br>25% pathology and 75% biohazardous waste as<br>required.  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Did not request both the shipping <u>and</u> tracking<br>documents from the transporters delivering waste to<br>the transfer station.   |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Tracking documents do not meet the requirements of<br>the Code of Federal Regulations (CFR) for the DOT<br>shipping documents.  |
| 4/10/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | The findings by the Department on November 20,<br>2014 that the autoclave computer was not consistently<br>printing the time/temperature readings have not been<br>corrected.             |
| 5/20/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Some pharmaceutical waste containers, individual,<br>secondary or the fiberboard boxes did not have the<br>proper labeling.   |
| 5/20/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Develop a process for ensuring that all documents are<br>completely and accurately filled out and that it is clear<br>where the waste is being transferred for out of state<br>treatment. |
| 5/20/2015 | 4144<br>Therese<br>Ave                        | California Department<br>of Public Health | Did not request both the shipping <u>and</u> tracking<br>documents from the transporters delivering waste to<br>the transfer station.   |

| DATE      | ADDRESS                                       | REGULATORY BODY/AGENCY                    | FINDING  |
|-----------|---|---|--|
|           | Fresno, CA<br>93725                           |   |  |
| 5/20/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Tracking documents do not meet the requirements of the Code of Federal Regulations (CFR) for the DOT shipping documents.   |
| 5/20/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | The findings by the Department on November 20, 2014 that the autoclave computer was not consistently printing the time/temperature readings have not been corrected. |
| 11/2/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | A few sharpmart transport carts were missing from the facility.  |
| 11/2/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Sanitec totes used to store and transport pathology waste to Healthwise for treatment were not labeled nor had tight fitting lids.                                   |
| 11/2/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Tracking documents are not staying with the waste and pharmaceutical containers were not secure.   |
| 11/2/2015 | 4144<br>Therese<br>Ave<br>Fresno, CA<br>93725 | California Department<br>of Public Health | Develop a process to ensure that documentation is as accurate as possible.   |

### F. Curtis Bay Energy Penalty Record

| Date       | Type | Summary  | Detail  | Fine Amount                                | Return to Compliance Date | Corrective Action  |
|------------|------|--|---|--|---------------------------|--|
| March 2015 | Air  | HCl Emissions failure was caused by incomplete Trona injection, CO Emissions failure was caused by incomplete combustion of the waste, and Opacity Emission. Failure was caused by bag malfunction | Hydrogen Chloride (HCl), Carbon Monoxide (CO), and opacity limit exceedance | Fine amount \$125,000, settlement \$50,000 | January 2016              | <ul style="list-style-type: none"> <li data-bbox="1138 401 1424 604">i. HCl Emissions failure was addressed Installation of a DSI (Dry Sorbent Injection System)</li> <li data-bbox="1138 611 1424 947">ii. CO failure was addressed by implementing better engineering practices and installing a new conveyor system for providing enhanced blended for better emissions control.</li> <li data-bbox="1138 953 1424 1157">iii. Opacity Emissions Failure was corrected with ongoing preventive maintenance of the bags.</li> </ul> |

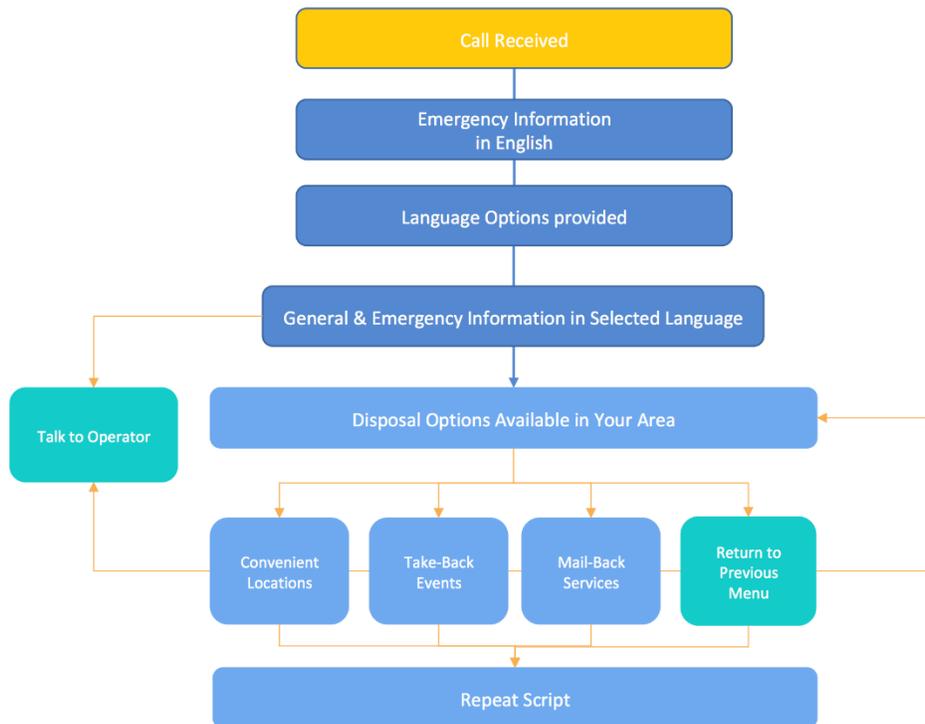
## Appendix J

### Sample Education and Outreach Call Center Script

# MED-Project™

Medication Education & Disposal

Thank you for calling the information line for the Medication Education and Disposal Project, or  
MED-Project.



#### Call Script:

- If you are experiencing a medical emergency, please hang up and dial 9-1-1.
- If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Poison Control at 800-222-1222.
- Unwanted Medicine Kiosks are located throughout your local area and provide convenient options for disposing of expired or Unwanted Medicine. Press 3 for more information about convenient kiosks.
- Mail-Back Services are available to Residents. Press 4 for more information.
- Take-back events may be scheduled throughout the year and offer Residents a free and convenient way to dispose of expired or Unwanted Medicine. Press 5 for more information.
- You may press 0 at any time to speak with an operator about disposal options.
- MED-Project is a consumer education campaign dedicated to proper medication use and consumer disposal.
- MED-Project reminds you that taking your medicine as directed by your health care provider is important to your health.

- If you have questions about your medication, please hang up and call your health care provider.
- For additional questions about the proper disposal of expired or unwanted medications from households, please go to [MEDProject.org](https://www.MEDProject.org) or press 0 to talk to an operator.
- To hear this menu again, please press 1.
- *Thank you for calling MED-Project.*

**Unwanted Medicine Kiosk Script for when Option 3 is selected:**

- Kiosks drop-off sites for Unwanted Medicine are located conveniently throughout your local area. To locate the site nearest you, or for precise information about hours of operation, press 0 to speak with an operator or visit [MEDProject.org](https://www.MEDProject.org) to search by your zip code.
- Kiosks accept medications in any dosage form in their original container or sealed bag. Items that are not accepted include herbal remedies, vitamins, supplements, cosmetics or other personal care products; medical devices; batteries; mercury-containing thermometers; sharps; and illicit drugs.
- If you do transfer your medications to a sealed bag before placing it into a kiosk, please be sure to recycle all remaining packaging.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
- To repeat this information, press 3.
- To return to the main menu, please press 1.
- *Thank you for calling MED-Project.*

**Unwanted Medicine Mail-Back Services Script for when Option 4 is selected:**

- Mail-Back Services for Unwanted Medicine and inhalers are available to Residents who are disabled and home-bound or home healthcare professionals providing services to disabled and home-bound Residents.
- Mail-Back Services are also available to all Residents for Pre-filled Injector Products.
- Unwanted Medicine Mail-Back Packages accept medications in any dosage form in their original container or sealed bag. Items that are not accepted include herbal remedies, vitamins, supplements, cosmetics or other personal care products; inhalers; medical devices; batteries; mercury-containing thermometers; sharps; or illicit drugs.
- To request a Mail-Back Package, please press 0 to talk to the operator or visit [MEDProject.org](https://www.MEDProject.org).
- Mail-Back Distribution Locations may also be available in your area.
- If you do transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
- To repeat this information, press 4.
- To return to the main menu, please press 1.
- *Thank you for calling MED-Project.*

**Unwanted Medicine Take-Back Event Script for when Option 5 is selected:**

- MED-Project may be working with local law enforcement and other community organizations to offer regular expired and Unwanted Medicine take-back events in your area. For a complete list of take-back events, please press 0 to speak to the operator, or visit [MEDProject.org](https://www.MEDProject.org).
- Take Back Events accept medications in any dosage form in their original container or sealed bag. Items that are not accepted include herbal remedies, vitamins, supplements, cosmetics or other personal care products; medical devices; batteries; mercury-containing thermometers; sharps; and illicit drugs.
- If you do transfer your medications to a sealed bag, please be sure to recycle all remaining packaging.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications or recycling your drug packaging.
- To repeat this information, press 5.
- To return to the main menu, please press 1.
- *Thank you for calling MED-Project.*

# Appendix K<sup>1</sup>

## Sample MED-Project Website

Translations of the MED-Project Website pages will be available in the Required Languages.

**MED-Project™**  
Medication Education & Disposal

Home MEDinfo MEDfaq Contact

### Santa Clara County, CA

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider. However, if you have expired or Unwanted Medicines or used Sharps, proper disposal is important and easy.

इस पृष्ठ को भारतीय भाषा में देखें  
このページを日本語でご覧ください  
이 페이지를 한국어로 보기  
查看本页面 (中文)  
Ver esta página en español  
Tingnan ang page na ito sa Tagalog  
Xem trang này bằng tiếng việt

EXPIRED UNWANTED

CHECK THE PACKAGE CONVENIENT LOCATIONS MAIL-BACK TAKE-BACK EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

<sup>1</sup> For resident convenience, MED-Project will include information about the collection of sharps on the MED-Project Website if Santa Clara County approves MED-Project's stewardship program for sharps required by the County of Santa Clara Safe Sharps Disposal Ordinance, County of Santa Clara Ordinance Code Division B11, Chapter XXI.

## Sample Web Page

### CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package, or package insert, please follow those instructions.

Never place sharps in the trash or recycling, and never flush them down the toilet. Disposing of sharps in the trash or recycling may put trash and sewage workers, janitors, housekeepers, household members, and children at risk of being harmed.

To protect your privacy, consumers are reminded to remove all personally identifiable information on medication labels or packaging before disposing of Unwanted Medicine.

(Source U.S. Food and Drug Administration)



CHECK THE  
PACKAGE



CONVENIENT  
LOCATIONS



MAIL  
BACK



TAKE-BACK  
EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## Sample Web Page

### CONVENIENT LOCATIONS

Community kiosk drop-off sites allow Residents to bring expired or Unwanted Medicines and Sharps to a convenient location for proper disposal.

#### UNWANTED MEDICINE:

**ACCEPTED:** MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*

**NOT ACCEPTED:** HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT DRUGS.

#### SHARPS:

**ACCEPTED:** SHARPS (SUCH AS HYPODERMIC NEEDLES, PEN NEEDLES, PRE-LOADED SHARPS, AUTO INJECTORS, INTRAVENOUS NEEDLES, LANCETS AND OTHER DEVICES USED TO PENETRATE THE SKIN FOR DRAWING BLOOD, OR FOR THE DELIVERY OF MEDICATIONS) CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.\*\*

**NOT ACCEPTED:** CONTROLLED SUBSTANCES, UNWANTED MEDICINE NOT CONTAINED IN SHARPS, AND LOOSE SHARPS THAT ARE NOT CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.

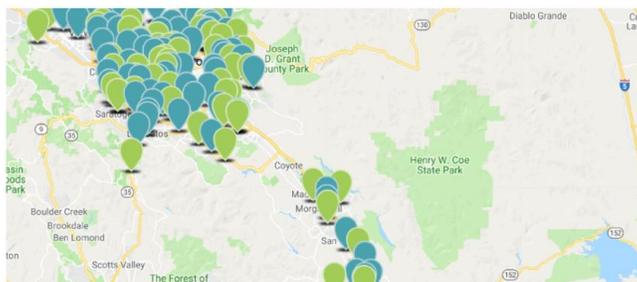
\*\*Approved sharps containers should be: made of a heavy-duty plastic; able to close with a tight-fitting, puncture-resistant lid, without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as "sharps waste" or with the biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.

To find the nearest disposal locations for Unwanted Medicine and Sharps, enter your zip code below.

For more information about the County of Santa Clara Safe Drug Disposal Ordinance, please see: [www.sccgov.org/sites/nwr/Pages/safemeds.aspx](http://www.sccgov.org/sites/nwr/Pages/safemeds.aspx)

Starting Point  Radius

Refine your results:  Unwanted Medicine Kiosks  Sharps Kiosks  Mail-Back Package Distribution Locations



*This list identifies information on some of the mail-back and kiosk programs, as well as take-back events, that may be available to Santa Clara County residents for disposing of Unwanted Medicines and Sharps. Some of the programs may be limited to a subset of Santa Clara County residents (e.g., residents actively using a specific medication). Please contact the programs before attempting to use them to confirm they are available to you and able to accept your medications.*

*MED-Project LLC has compiled this list based on publicly available information for your convenience, but does not guarantee the accuracy of any of the information on it. MED-Project LLC does not endorse and denies any responsibility or liability for the programs listed or the processes they employ for collection, transportation, treatment, or disposal of the medications they collect.*



CHECK THE PACKAGE



CONVENIENT LOCATIONS



MAIL BACK



TAKE-BACK EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the view of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## Sample Web Page<sup>2</sup>

### MAIL-BACK

#### UNWANTED MEDICINES MAIL-BACK SERVICES:

Mail-Back Services for Unwanted Medicines are available to disabled and home-bound Residents upon request. Medications in any dosage form in their original container or sealed bag are accepted.\*\* Home healthcare professionals providing services to disabled and home-bound Residents may request a Mail-Back Package on their behalf.

**Note:** The following items are not accepted in Unwanted Medicine Mail-Back Envelopes: Herbal remedies, vitamins, supplements, cosmetics, other personal care products, inhalers, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

\*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

#### INHALER MAIL-BACK SERVICES:

Mail-Back Services for Inhalers are available to disabled and home-bound Residents upon request. Home healthcare professionals providing services to disabled and home-bound Residents may request a Mail-Back Package on their behalf.

**Note:** Only place undamaged inhalers in their original containers in the Inhaler Mail-Back Package. Inhaler Mail-Back Packages can only be used for inhalers and cannot accept other types of items.

#### SHARPS MAIL-BACK SERVICES:

Mail-Back Services for Sharps are available to all Residents upon request. Persons providing caretaker services to Residents may also request Mail-Back packages on their behalf. Sharps (such as hypodermic needles, pen needles, pre-loaded sharps, auto-injectors, intravenous needles, lancets and other devices used to penetrate the skin for drawing blood or for the delivery of medications) contained in U.S. Food and Drug Administration-cleared sharps containers are accepted.\*\*

**Note:** The following items are not accepted in Sharps Mail-Back Packages: Controlled substances, unwanted medicine not contained in sharps, and loose sharps that are not contained in U.S. Food and Drug Administration-cleared sharps containers.

\*\*\*All sharps disposal containers should be made of a heavy-duty plastic; able to close with a tight-fitting puncture resistant lid without sharps being able to come out; upright and stable during use; leak resistant; and properly labeled as "sharps waste" or with the biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.

Please complete the below form to request a pre-paid, pre-addressed mail-back package. Instructions for disposal will be provided with all mail-back services. This form may be submitted more than once if multiple packages are needed.

Select Quantity\*

Select your Package type\*

Contact Information

First Name\*

Last Name\*

Email

Address\*

Address 2

City\*

California

Zip Code\*

**SUBMIT REQUEST**



CHECK THE PACKAGE



CONVENIENT LOCATIONS



MAIL BACK



TAKE-BACK EVENTS

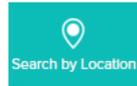
This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

<sup>2</sup> Mail-Back Services for disabled and home-bound Residents for certain products available through the MED-Project Website and Call Center services will meet requirements pursuant to Ordinance § B11-545(b)(5).

## Sample Web Page

**MED-Project™**

Medication Education & Disposal



### TAKE-BACK EVENTS

Local Take-Back Events offer residents a free and convenient way to dispose of expired or Unwanted Medicine and Sharps. The local authorities and MED-Project may also sponsor local drug take-back days in your area.

#### UNWANTED MEDICINE:

**ACCEPTED:** MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*

**NOT ACCEPTED:** HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT DRUGS.

#### SHARPS:

**ACCEPTED:** SHARPS (SUCH AS HYPODERMIC NEEDLES, PEN NEEDLES, PRE-LOADED SHARPS, AUTO-INJECTORS, INTRAVANEIOUS NEEDLES, LANCETS, AND OTHER DEVICES USED TO PENETRATE THE SKIN FOR DRAWING BLOOD, OR FOR THE DELIVERY OF MEDICATIONS) CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.\*\*

**NOT ACCEPTED:** CONTROLLED SUBSTANCES, UNWANTED MEDICINE NOT CONTAINED IN SHARPS, AND LOOSE SHARPS THAT ARE NOT CONTAINED IN U.S. FOOD AND DRUG ADMINISTRATION-CLEARED SHARPS CONTAINERS.

*\*\*Approved sharps containers must be: made of heavy-duty plastic; able to close with a tight-fitting, puncture resistant lid, without sharps being able to come out; upright and stable during use; leak-resistant; and properly labeled as "sharps waste" or with biohazard symbol and the word "BIOHAZARD" to warn of hazardous materials inside the container.*



CHECK THE  
PACKAGE



CONVENIENT  
LOCATIONS



MAIL-BACK



TAKE-BACK  
EVENTS

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## Sample Web Page

### MEDInfo

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications and sharps securely to prevent accidental ingestion or misuse by others in your household, especially children.

There are a number of ways to dispose of expired or Unwanted Medicines and Sharps. To protect your privacy, consumers are reminded to remove all personally identifiable information on medication labels or packaging before disposing of Unwanted Medicine.

For additional information on the program, MED-Project has developed an educational toolkit, including:

Unwanted Medicine Brochure:

[English](#) [हिंदी](#) [日本語](#) [한국어](#) [中文](#) [Español](#) [Tagalog](#) [Tiếng Việt](#)

Sharps Brochure:

[English](#) [हिंदी](#) [日本語](#) [한국어](#) [中文](#) [Español](#) [Tagalog](#) [Tiếng Việt](#)

Frequently Asked Questions:

[English](#) [हिंदी](#) [日本語](#) [한국어](#) [中文](#) [Español](#) [Tagalog](#) [Tiếng Việt](#)

Radio Public Service Announcement (PSA):

[PLAY](#)

Video Public Service Announcement (PSA):

[PLAY](#)

If you would like any of the Unwanted Medicine Program materials emailed to you, contact [santaclaracounty@med-project.org](mailto:santaclaracounty@med-project.org).  
If you would like any of the Sharps Program materials emailed to you, contact [santaclaracountysharps@med-project.org](mailto:santaclaracountysharps@med-project.org).

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## Sample Web Page

### MEDfaq

- [+ What is the MED-Project?](#)
- [+ What should I do if I am having a medical emergency?](#)
- [+ What should I do if I think I have ingested something poisonous?](#)
- [+ What should I do if my pet has ingested medication?](#)
- [+ Whom should I call with a question about my medication?](#)
- [+ Where can I find information about the safe storage of medication?](#)
- [+ Where can I find information about California's Prop 65?](#)
- [+ Should I remove my personal information before disposing of my medication?](#)
- [+ Where are the MED-Project disposal locations nearest me?](#)
- [+ Will it cost me anything to dispose of my expired or unwanted medications?](#)
- [+ What items can I dispose of in the MED-Project kiosks?](#)
- [+ Will there be a take-back event in my area?](#)
- [+ I am disabled or homebound and am unable to go to a kiosk or attend a take-back event. How can I dispose of my expired or unwanted medicine?](#)
- [+ I have a question not answered by this website. Is there someone I can contact with a question about MED-Project?](#)
- [+ What is recommended for safe disposal of expired or unwanted medicine in my area?](#)
- [+ Where can I find more information about The Santa Clara County Household Hazardous Waste Program?](#)
- [+ इस पृष्ठ को भारतीय भाषा में देखें](#)
- [+ このページを日本語でご覧ください](#)
- [+ 이 페이지를 한국어로보기](#)
- [+ 查看本页面 \(中文\)](#)
- [+ Ver esta página en español](#)
- [+ Tingnan ang page na ito sa Tagalog](#)
- [+ Xem trang này bằng tiếng việt](#)

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

## Sample Web Page

**MED-Project™**

Medication Education & Disposal



### CONTACT

If you are experiencing a medical emergency, please dial 911. If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Poison Control at 1 (800)-222-1222. If you have questions about your medication, please dial your health care provider.

For answers to some frequently asked questions about MED-Project, [click here](#).

#### Residents

If you are a resident of Santa Clara County and have questions about MED-Project, please contact:

1 844 MED-PROJECT or 1 (844) 633-7765

#### Pharmacies and Law Enforcement Offices

If you are a current kiosk drop-off host site, or a retail pharmacy, hospital/clinic pharmacy or law enforcement agency interested in hosting a drop-box, contact:

Dr. Victoria Travis, PharmD, MS, MBA  
National Program Director  
MED-Project LLC  
Phone: 1 (844) 677-6532  
Fax: 1 (510) 686-8837

Email Inquiries for:

Unwanted Medicine Disposal: [santaclaracounty@med-project.org](mailto:santaclaracounty@med-project.org)  
Sharps Disposal: [santaclaracountysharps@med-project.org](mailto:santaclaracountysharps@med-project.org)

#### Drug Producers:

If you are a drug producer interested in participating in a MED-Project stewardship plan, contact:

Phone: 1 (202) 495-3131  
Email: [compliance@med-project.org](mailto:compliance@med-project.org)

#### Sharps Producers:

If you are a sharps producer interested in participating in a MED-Project stewardship plan, contact:

Phone: 1 (202) 495-3131  
Email: [compliance@med-project.org](mailto:compliance@med-project.org)

This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.

# Appendix L

## Sample Brochure and Mail-Back Inserts

Translations of the brochure will be available in the Required Languages.

### Front of brochure

**WHAT SHOULD YOU DO WITH YOUR UNWANTED OR EXPIRED MEDICINES?**

**MED-Project™**  
Medication Education & Disposal

**SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES**

*There are a number of ways to dispose of expired or unwanted medicines.*

For more information about the MED-Project program, go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-PROJECT

What should you do with your expired or unwanted medicines?

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicine as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent accidental ingestion or misuse by others in your household, especially children.

If you have expired or unwanted medication, proper disposal is easy. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the following disposal options.

(Source: U.S. Food and Drug Administration)



*This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.*



*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*

**MED-Project™**  
Medication Education & Disposal  
[www.med-project.org](http://www.med-project.org)

## DISPOSAL OPTIONS

### 1 CHECK THE PACKAGE



If there are specific instructions for disposal on the label, package or package insert, please follow those instructions.

### 2 CONVENIENT LOCATIONS



To find drop-off sites in your area, visit the Convenient Locations section of [www.med-project.org](http://www.med-project.org). Mail-Back Distribution Locations may also be available in your area.

## What items can I dispose of at a kiosk?



**ACCEPTED:**  
MEDICATIONS IN ANY DOSAGE FORM, EXCEPT FOR THOSE LISTED BELOW, IN THEIR ORIGINAL CONTAINER OR SEALED BAG.\*

*\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.*



**NOT ACCEPTED:**  
HERBAL REMEDIES, VITAMINS, SUPPLEMENTS, COSMETICS, OTHER PERSONAL CARE PRODUCTS, MEDICAL DEVICES, BATTERIES, MERCURY-CONTAINING THERMOMETERS, SHARPS, AND ILLICIT DRUGS.

## DISPOSAL OPTIONS

### 3 MAIL-BACK



Mail-back services for Unwanted Medicines, Pre-filled Injector Products, and Inhalers may be available in your area. Visit [www.med-project.org](http://www.med-project.org) to order a Mail-Back Package.

### 4 TAKE-BACK EVENTS



Local Take-Back Events offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Visit [www.med-project.org](http://www.med-project.org) for information on events in your area.



To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.

## Sample Standard Mail-Back Package Insert

Front of insert

MAIL-BACK PACKAGE IS FOR  
**UNWANTED OR**  
**EXPIRED**  
MEDICATIONS



**ACCEPTED:** Medications in any dosage form, except those listed below, in their original container or sealed bag.\*

\*If transferring medications to a sealed bag, please be sure to recycle all remaining packaging.

**NOT ACCEPTED:** Herbal remedies, vitamins, supplements, cosmetics, other personal care products, inhalers, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

*To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.*

*This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.*

## Sample Inhaler Mail-Back Package Insert

Front of insert

MAIL-BACK PACKAGE IS FOR

# INHALERS

**ACCEPTED:** Inhalers



**NOT ACCEPTED:** Unwanted medicines that are not inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

*Note: Only place undamaged inhalers in their original containers in the Inhaler Mail-Back Package. Inhaler Mail-Back Packages can only be used for inhalers and cannot accept other types of items.*

*To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the disposal options listed above.*

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## Sample Injector Mail-Back Package Insert

Front of insert

### MAIL-BACK PACKAGE IS FOR PRE-LOADED PRODUCTS CONTAINING A SHARP AND AUTO-INJECTORS



**ACCEPTED:** Pre-loaded products containing a sharp and auto-injectors.

**NOT ACCEPTED:** Unwanted medicines that are not pre-loaded products containing a sharp or auto-injectors, inhalers, herbal remedies, vitamins, supplements, cosmetics, other personal care products, medical devices, batteries, mercury-containing thermometers, sharps, and illicit drugs.

*Note: Injector Mail-Back Packages can only be used for pre-filled injector products and cannot accept other types of items.*

*This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in the MED-Project Product Stewardship Plan.*

# MED-Project<sup>TM</sup>

## Medication Education & Disposal

### DISPOSAL OPTIONS:

#### 1 CHECK THE PACKAGE

If there are specific instructions for disposal on the label, package, or package insert, please follow those instructions.

#### 2 CONVENIENT LOCATIONS

To find the drop-off sites in your area, visit the Convenient Locations section of [www.med-project.org](http://www.med-project.org). Mail-Back Distribution Locations may also be available in your area.

#### 3 MAIL-BACK

Mail-Back services for Unwanted Medicines, Pre-filled Injector Products, and Inhalers may be available in your area. Visit [www.med-project.org](http://www.med-project.org) to order a Mail-Back Package.

#### 4 TAKE-BACK EVENTS

Local Take-Back Events offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Visit [www.med-project.org](http://www.med-project.org) for information on events in your area.

For more information about the MED-Project program, please go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-PROJECT.

*This material has been provided for the purpose of compliance with legislation and does not necessarily reflect the views of MED-Project or the Producers participating in MED-Project Product Stewardship Plan.*

## Appendix M

### Sample Media List

The following is a representative list of sample key media outlets options available to help educate residents about proper disposal of expired or Unwanted Medicine. The list includes local print, online, television, and radio outlets, as well as outlets specifically targeting the diverse demographic communities within the County.

MED-Project anticipates that 3 to 4 media outlets will be used during the year at a 2+ frequency depending on the type of activity.

| PRINT OUTLETS             | COVERAGE AREA | WEBSITE   |
|---------------------------|---------------|---|
| Alianza Metropolitan News | San Jose      | <a href="http://noticias.alianzanews.com/">http://noticias.alianzanews.com/</a>         |
| Almaden Resident          | San Jose      | <a href="http://www.community-newspapers.com/">http://www.community-newspapers.com/</a> |
| Almaden Times Weekly      | San Jose      | <a href="http://almadentimes.com/">http://almadentimes.com/</a>                         |
| Berryessa Sun             | Milpitas      | <a href="http://www.mercurynews.com/berryessa">http://www.mercurynews.com/berryessa</a> |
| Cali Today                | San Jose      | <a href="http://baocalitoday.com/">http://baocalitoday.com/</a>                         |
| Campbell Reporter         | San Jose      | <a href="http://www.mercurynews.com/campbell">http://www.mercurynews.com/campbell</a>   |
| Cupertino Courier         | San Jose      | <a href="http://www.mercurynews.com/cupertino">http://www.mercurynews.com/cupertino</a> |
| El Observador             | San Jose      | <a href="http://el-observador.com/">http://el-observador.com/</a>                       |
| Gilroy Dispatch           | Gilroy        | <a href="http://www.gilroydispatch.com/">http://www.gilroydispatch.com/</a>             |
| India Currents            | San Jose      | <a href="https://www.indiacurrents.com/">https://www.indiacurrents.com/</a>             |
| La Oferta                 | San Jose      | <a href="http://www.laoferta.com">http://www.laoferta.com</a>                           |
| Los Altos Town Crier      | Los Altos     | <a href="http://www.losaltosonline.com">http://www.losaltosonline.com</a>               |
| Los Gatos Weekly Times    | San Jose      | <a href="http://www.mercurynews.com/losgatos">http://www.mercurynews.com/losgatos</a>   |
| Morgan Hill Times         | Morgan Hill   | <a href="http://www.morganhilltimes.com/">http://www.morganhilltimes.com/</a>           |
| Mountain View Voice       | Palo Alto     | <a href="http://www.mv-voice.com/">http://www.mv-voice.com/</a>                         |
| Nikkei West               | San Jose      | <a href="http://www.nikkeiwest.com">www.nikkeiwest.com</a>                              |
| Palo Alto Weekly          | Palo Alto     | <a href="http://www.paloaltoonline.com/">http://www.paloaltoonline.com/</a>             |

| PRINT OUTLETS                   | COVERAGE AREA  | WEBSITE   |
|---------------------------------|----------------|---|
| Rosegarden Resident             | San Jose       | <a href="http://www.mercurynews.com/location/rose-garden/">http://www.mercurynews.com/location/rose-garden/</a> |
| San Jose Mercury News           | San Jose       | <a href="http://www.mercurynews.com">http://www.mercurynews.com</a>   |
| Santa Clara Weekly              | Santa Clara    | <a href="http://www.santaclaraweekly.com">http://www.santaclaraweekly.com</a>                                   |
| Saratoga News                   | San Jose       | <a href="http://www.mercurynews.com/saratoga">http://www.mercurynews.com/saratoga</a>                           |
| Silicon Valley Business Journal | San Jose       | <a href="http://siliconvalleybusinessjournal.com/">http://siliconvalleybusinessjournal.com/</a>                 |
| Spartan Daily (University)      | San Jose       | <a href="http://www.sjsunews.com/spartan_daily/">http://www.sjsunews.com/spartan_daily/</a>                     |
| The Recorder                    | Silicon Valley | <a href="http://www.therecorder.com">http://www.therecorder.com</a>   |
| The Santa Clara (University)    | Santa Clara    | <a href="http://thesantaclara.org">http://thesantaclara.org</a>   |
| The Sunnyvale Sun               | San Jose       | <a href="http://www.mercurynews.com/sunnyvale">http://www.mercurynews.com/sunnyvale</a>                         |
| Viet Nam Daily News             | San Jose       | <a href="http://www.vietnamdaily.com/">http://www.vietnamdaily.com/</a>   |
| Willow Glen Resident            | San Jose       | <a href="http://www.mercurynews.com/location/willow-glen/">http://www.mercurynews.com/location/willow-glen/</a> |

| TELEVISION OUTLETS IN THE SAN FRANCISCO BAY AREA | NETWORK        |
|--|----------------|
| KDTV   | Univision      |
| KEMO   | Azteca America |
| KGO  | ABC            |
| KICU   | Independent    |
| KNTV   | NBC            |
| KPIX   | CBS            |
| KQED   | PBS            |
| KRON   | Media General  |
| KSTS   | Telemundo      |
| KTSF   | Independent    |
| KTVU   | FOX            |
| Vien Thao Media                                  | Independent    |

| RADIO OUTLETS               | CITY/COVERAGE AREA     |
|-----------------------------|------------------------|
| KALW FM 91.7                | San Francisco Bay Area |
| KARA 105.7 FM               | San Francisco Bay Area |
| KBAY-FM (94.5)              | San Francisco Bay Area |
| KBRG 100.3 FM               | San Francisco Bay Area |
| KCBS AM 740                 | San Francisco Bay Area |
| KCSF (College app radio)    | San Francisco Bay Area |
| KEZR-106.5 FM               | San Francisco Bay Area |
| KGO AM 810                  | San Francisco Bay Area |
| KIQI 1010 AM                | San Francisco Bay Area |
| KLIV 1590 AM                | San Francisco Bay Area |
| KLOK 1170 AM                | San Francisco Bay Area |
| KQED FM 88.5                | San Francisco Bay Area |
| KRTY 95.3 FM                | San Francisco Bay Area |
| KSFO AM 560                 | San Francisco Bay Area |
| KSJO 92.3 FM                | San Francisco Bay Area |
| KSJS 90.7 FM                | San Francisco Bay Area |
| KSJX 1500 AM                | San Francisco Bay Area |
| KUSF (College online radio) | San Francisco Bay Area |
| KZSF 1370 AM                | San Francisco Bay Area |
| KZSF-AM                     | San Francisco Bay Area |
| KZSJ 1120 AM                | San Francisco Bay Area |
| VNFM 96.1 FM                | San Francisco Bay Area |

## Appendix N

### Sample Digital and Local Social Networks

The following is a representative list of local organizations and their social media networks in Santa Clara County.

| OUTLET   | FACEBOOK  | TWITTER           |
|--|---|-------------------|
| County of Santa Clara                            | <a href="https://www.facebook.com/county.of.santa.clara/?ref=ts">https://www.facebook.com/county.of.santa.clara/?ref=ts</a>         | @SCCgov           |
| SCC Consumer and Environmental Protection Agency | <a href="https://www.facebook.com/cepascc/">https://www.facebook.com/cepascc/</a>   |                   |
| Santa Clara County Public Health Department      | <a href="https://www.facebook.com/sccpublichealth">https://www.facebook.com/sccpublichealth</a>                                     | @HealthySCC       |
| Santa Clara Emergency Medical Services           | <a href="https://www.facebook.com/SantaClaraCountyEMS">https://www.facebook.com/SantaClaraCountyEMS</a>                             | @XSCEMS           |
| City of Mountain View                            | <a href="https://www.facebook.com/MountainViewCityHall/">https://www.facebook.com/MountainViewCityHall/</a>                         | @mntviewcityhall  |
| City of Sunnyvale                                | <a href="https://www.facebook.com/CityofSunnyvaleCA">https://www.facebook.com/CityofSunnyvaleCA</a>                                 | @CityofSunnyvale  |
| City of Morgan Hill                              | <a href="https://www.facebook.com/morganhillengage">https://www.facebook.com/morganhillengage</a>                                   | @CityofMorganHill |
| City of San Jose                                 | <a href="https://www.facebook.com/CityofSanJose?ref=ts">https://www.facebook.com/CityofSanJose?ref=ts</a>                           | @SanJoseInfo      |
| City of Santa Clara                              | <a href="https://www.facebook.com/CityofSantaClara">https://www.facebook.com/CityofSantaClara</a>                                   | @SantaClaraCity   |
| City of Palo Alto                                | <a href="http://www.cityofpaloalto.org/socialmedia/default.asp">http://www.cityofpaloalto.org/socialmedia/default.asp</a>           | @CityofPaloAlto   |
| City of Cupertino                                | <a href="https://www.facebook.com/City-of-Cupertino-City-Government">https://www.facebook.com/City-of-Cupertino-City-Government</a> | @CityofCupertino  |
| City of Milpitas                                 | <a href="https://www.facebook.com/CityofMilpitas">https://www.facebook.com/CityofMilpitas</a>                                       | @MilpitasCityJob  |
| City of Campbell                                 | <a href="https://www.facebook.com/CampbellCalifornia">https://www.facebook.com/CampbellCalifornia</a>                               | @CityofCampbell   |

| OUTLET                                       | FACEBOOK  | TWITTER          |
|--|---|------------------|
| Town of Los Gatos                            | <a href="http://www.town.los-gatos.ca.us/Facebook">http://www.town.los-gatos.ca.us/Facebook</a>   | @TownLG          |
| City of Gilroy                               | <a href="https://www.facebook.com/City-of-Gilroy-Public-Information-Office">https://www.facebook.com/City-of-Gilroy-Public-Information-Office</a> | @cityofgilroy    |
| City of Los Altos                            | <a href="https://www.facebook.com/CityOfLosAltos/">https://www.facebook.com/CityOfLosAltos/</a>   | @CityofLosAltos  |
| City of Los Altos Hills                      | <a href="https://www.facebook.com/TownofLosAltosHills">https://www.facebook.com/TownofLosAltosHills</a>   |                  |
| Santa Clara Office Sheriff's Office          | <a href="https://www.facebook.com/sccosheriff">https://www.facebook.com/sccosheriff</a>   | @SCCoSheriff     |
| Santa Clara Police Department                | <a href="https://www.facebook.com/santaclarapd?_rdr=p">https://www.facebook.com/santaclarapd?_rdr=p</a>   | @SantaClaraPD    |
| San Jose Police Department                   | <a href="https://www.facebook.com/SanJosePD">https://www.facebook.com/SanJosePD</a>   | @SanJosePD       |
| Sunnyvale Police Department                  | <a href="https://www.facebook.com/CityofSunnyvaleCA">https://www.facebook.com/CityofSunnyvaleCA</a>   | @CityofSunnyvale |
| Mountain View Police Department              | <a href="https://www.facebook.com/mountainviewpolicedepartment/">https://www.facebook.com/mountainviewpolicedepartment/</a>                       | @MountainViewPD  |
| Los Altos Police Department                  | <a href="https://www.facebook.com/LosAltosPolice/">https://www.facebook.com/LosAltosPolice/</a>   | @LosAltosPD      |
| Santa Clara Unified School District          | <a href="https://www.facebook.com/SantaClaraUSD">https://www.facebook.com/SantaClaraUSD</a>   | @SantaClaraUSD   |
| Santa Clara Office of Education              | <a href="https://www.facebook.com/SCCOE">https://www.facebook.com/SCCOE</a>   | @SCCOE           |
| Stanford Health Care                         | <a href="https://www.facebook.com/StanfordHealthCare/">https://www.facebook.com/StanfordHealthCare/</a>   | @StanfordHealth  |
| Lucille Packard Children's Hospital Stanford | <a href="https://www.facebook.com/stanfordchildrens">https://www.facebook.com/stanfordchildrens</a>   | @StanfordChild   |
| Regional Medical Center                      | <a href="https://www.facebook.com/RegionalMedicalSanJose">https://www.facebook.com/RegionalMedicalSanJose</a>                                     | @RegMedCtrSJ     |
| Santa Clara Valley Medical Center            | <a href="https://www.facebook.com/SCVMC">https://www.facebook.com/SCVMC</a>   | @HealthySCC      |
| Kaiser Permanente Santa Clara Medical Center | <a href="https://www.facebook.com/kpthrive">https://www.facebook.com/kpthrive</a>   | @KPSantaClara    |

| OUTLET   | FACEBOOK  | TWITTER             |
|--|---|---------------------|
| <b>El Camino Hospital</b>                                    | <a href="https://www.facebook.com/elcaminohospital">https://www.facebook.com/elcaminohospital</a>         | @elcaminohos<br>sp  |
| <b>VA Palo Alto Health Care System</b>                       | <a href="https://www.facebook.com/VeteransAffairs">https://www.facebook.com/VeteransAffairs</a>           | @DeptVetAff<br>airs |
| <b>San Jose State University</b>                             | <a href="https://www.facebook.com/sanjosestate">https://www.facebook.com/sanjosestate</a>                 | @SJSU               |
| <b>Santa Clara University</b>                                | <a href="https://www.facebook.com/SantaClaraUniversity">https://www.facebook.com/SantaClaraUniversity</a> | @SantaClara<br>Univ |
| <b>DeAnza College</b>  | <a href="https://www.facebook.com/deanzacollege">https://www.facebook.com/deanzacollege</a>               | @deanza_coll<br>ege |
| <b>California Pharmacist Association</b>                     | <a href="https://www.facebook.com/CAPharm">https://www.facebook.com/CAPharm</a>                           | @CAPharm            |
| <b>California Nurses Association</b>                         | <a href="https://www.facebook.com/nationalnurses">https://www.facebook.com/nationalnurses</a>             | @NationalNur<br>ses |
| <b>National Association of Social Workers<br/>California</b> | <a href="https://www.facebook.com/naswca">https://www.facebook.com/naswca</a>                             | @naswca             |

## Appendix O

### Detailed Marketing Plan

| GOVERNMENT AGENCIES, HEALTHCARE/VETERINARY ORGANIZATIONS, STAKEHOLDER ENGAGEMENTS |   |   |  |   |             |   |
|---|---|---|--|---|-------------|---|
| Vehicle   | Audience  | Purpose / Message   | Item / Event / Channel   | Proposed Frequency / Date   | Owner       | Ordinance   |
| Email Distribution  | Public health, healthcare, veterinary, law enforcement, and community organizations and health associations | Promote appropriate disposal and how to use the program                     | Online, Email  | Once/Quarter<br><br>Send program information flyer to contact list (senior centers; community centers; vet clinics, healthcare clinics, etc.) | MED-Project | Sec B11-547(a)(1/2/5)   |
| Toolkit   | Local government, retailers, other key stakeholders   | Toolkit of materials for dissemination to network of support                | Available on MED-Project Website and by request                                      | Upon Request  | MED-Project | <ul style="list-style-type: none"> <li>Sec B11-547(a)(1/2/5)</li> <li>Sec B11-547(b)</li> </ul> |
| Stakeholder Engagement  | Local government agencies, local community organizations, health associations                               | Promote program awareness, appropriate disposal, and how to use the program | Newsletters, blogs, print material, URL on stakeholder websites, stakeholder toolkit |   | Stakeholder | Sec B11-547(a)(1/2)   |

| GENERAL PUBLIC          |                                   |  |  |  |             |   |
|-------------------------|-----------------------------------|--|--|--|-------------|---|
| Vehicle                 | Audience                          | Purpose / Message  | Item / Event / Channel   | Proposed Frequency / Date  | Owner       | Ordinance/Plan Requirements   |
| MED-Project Website     | Residents                         | Education about collection and safe disposal of meds, drop-off sites, events                   | MED-Project Website  | Website access will be available 24/7 for Residents  | MED-Project | Sec B11-547(a)(4)   |
| MED-Project Call Center | Residents                         | Call center to answer questions from general public about drop-off locations and drug disposal | Call Center  | Residents can contact the call center 24/7, with access to a live operator during regular business hours (9-5pm M-F; except during holidays)       | MED-Project | <ul style="list-style-type: none"> <li>• Sec B11-547(a)(4)</li> <li>• Sec B11-547(b)</li> </ul> |
| Mail-Back Services      | Disabled and home-bound Residents | Create awareness of disposal options in community  | Call Center; MED-Project Website/Online, community newsletters, email, radio spots, etc. | Once/Quarter<br>Send program information flyer to contact list (senior centers; community centers; vet clinics, healthcare clinics, etc.)          | MED-Project | Sec B11-547(a)(7)   |
| Social Media            | Residents                         | Create awareness of disposal options in community  | Social Media marketing – Facebook, Twitter, etc.   | 2-3 times/Month<br>Posting Activity on social media (Facebook page and Twitter)<br>Q2 2018:<br>Social media campaign with PSA video (2+ frequency) | MED-Project | Sec B11-547(a)(1/2)   |

| GENERAL PUBLIC            |   |   |   |  |             |                             |
|---------------------------|---|---|---|--|-------------|-----------------------------|
| Vehicle                   | Audience  | Purpose / Message   | Item / Event / Channel                                  | Proposed Frequency / Date  | Owner       | Ordinance/Plan Requirements |
| PSA, Videos               | Residents   | Create awareness and educate community on program           | Available to stakeholders, County website, social media | Posted on Facebook and Website for downloading 24/7  | MED-Project | Sec B11-547(a)(1/2)         |
| PSA, Radio                | Residents   | Promote awareness of disposal program in community          | Public radio  | Q4 2018<br>Dates can be provided when activity has been booked   | MED-Project | Sec B11-547(a)(1/2)         |
| Local Media Placements    | Residents - specific segments/groups of community         | Promote why medicine return and how to use the program      | PR-placed stories in radio, TV, online, and blogs       | Q3 – Q42018<br>Dates can be provided when activity has been booked   | MED-Project | Sec B11-547(a)(1/2)         |
| i) Advertising Placements | ii) Residents - specific segments/groups of the community | iii) Promote why medicine return and how to use the program | Ads placed on a variety of media platforms              | Q4 2017 (Regional):<br>Print ad for kiosk/program information.<br>Q3-Q4 2018 (Regional):<br>TBD based on results and data from Q4 2017 activity.<br>(2+ Frequency) | MED-Project | Sec B11-547(a)(1/2)         |

| COLLECTORS                                 |  |   |  |  |             |   |
|--|--|---|--|--|-------------|---|
| Vehicle                                    | Audience   | Purpose / Message   | Item / Event / Channel   | Proposed Frequency / Date  | Owner       | Ordinance/Plan Requirements   |
| Outreach to potential Kiosk Drop-Off Sites | Potential Kiosk Drop-Off Sites that include non-participating or new Retail Pharmacies | Establishing Kiosk Drop-Off Sites distributed throughout the County | Letters  | 1x / Year  | MED-Project | Sec B11-547(a)(4)   |
| Kiosk Toolkit                              | Potential Kiosk Drop-Off Sites   | Education about collection  | FAQs and Fact Sheet for interested potential collection sites                                  | Upon Request – provided within 5-10 business days  | MED-Project | Sec B11-547(a)(1/2/3)   |
| Kiosk Toolkit                              | Residents  | Education on collection methods                                     | Signage, brochures, flyers to help guide residents to use kiosks, minimizing staff involvement | At time of installation<br>Restocking of material upon request, and provided within 5-10 business days | MED-Project | <ul style="list-style-type: none"> <li>• Sec B11-547(a)(1/2/5)</li> <li>• Sec B11-547(b)</li> </ul> |

