

# COUNTY OF SANTA CLARA CONSUMER AND ENVIRONMENTAL PROTECTION AGENCY

## SAFE DRUG DISPOSAL

# STEWARDSHIP PLAN

**PROPOSAL**  
MAY 23, 2020



SUBMITTED BY:



**INMAR**  
intelligence

+



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Proposal Summary ..... 02

**I. Producer Participation in Plan | Contact Information** ..... 02

**II. Proposed Collection System** ..... 03

    A. Kiosk Service ..... 03

    B. Mail-Back Services ..... 10

**III. Handling and Disposal**..... 13

**IV. Policies and Procedures** ..... 14

**V. Patient Privacy**..... 17

**VI. Outreach Program Design**..... 17

**VII. Program Goals**..... 22

**VIII. Drug Separation & Recycling** ..... 23

**IX. Annual Reports** ..... 23

**Appendix** ..... 26

    A. Potential Collection Sites..... 27

    B. Kiosk Signage ..... 32

    C. Training Material ..... 34

    D. Promotion Material ..... 55

    E. Applicable Permits and Licenses ..... 62

## PROPOSAL SUMMARY

Inmar will provide a comprehensive Stewardship Plan compliant with Santa Clara County Ordinance number NS-517.91 and the Safe Drug Disposal Regulations and will include Covered Drug collection methods supported by outreach and education programs to increase County Resident awareness and participation. The Stewardship Plan will provide safe, secure, and convenient access on an ongoing basis for County Residents and will be funded by participating covered Producers. The program will also provide reporting on collection metrics and results of education and outreach campaigns. Inmar will notify the applicable governing bodies fifteen (15) days prior to making any changes to the program that materially impact the operation of the Stewardship Plan. All capitalized terms not otherwise defined shall have the same meaning as in the Ordinance and Regulation.

Inmar's proposal includes the following:

- **Equitable & Reasonably Convenient Access:** Kiosk placements at authorized Collector locations and alternative methods for underserved areas (e.g., Mail-Back Service envelopes and Take-Back Events)
- **Covered Drug Collection Systems:**
  - **Kiosk Service:** Turn-key program with DEA and DOT compliant processes and materials
  - **Mail-Back Services:** Available for distribution at select authorized Collectors or by request via a website or toll-free phone service
  - **Take-Back Events:** Coordinated initiatives with local authorities to manage secure events at alternative locations in underserved communities
- **Education & Outreach:** Strategic deployment of Inmar's Media assets and expertise as well as far-reaching retail Pharmacy relationships, to drive awareness and participation
- **Annual Reporting:** Insight into required collection and outreach metrics.

## I. PRODUCER PARTICIPATION IN PLAN | CONTACT INFORMATION

✓ Ordinance No. NS-517.91 § B11-542(a)

### 1. Inmar Plan Liaisons

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## 2. Producer(s)

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Phone: 732-253-5954

Inmar has secured commitments from additional producers and upon Plan approval by the department, will provide a supplemental list with the Producer names and contact information.

## II. PROPOSED COLLECTION SYSTEM

✓ Ordinance No. NS-517.91 § B11-542(b)

Kiosk placements at authorized Collector locations will be reasonably convenient and alternative methods for underserved areas (e.g., Mail-Back Services envelopes) will be available. Per § B11-545(a) “Stewardship Plans – Collection of Covered Drugs” Inmar does not require any Person to serve as a Collector in a Stewardship Plan. A Person may offer to serve as a Collector voluntarily or may agree to serve as a Collector in exchange for incentives or payments offered by a Producer, group of Producers, or Stewardship Organization. In accordance with § B11-545(b) (3) “Stewardship Plans – Collection of Covered Drugs”, Inmar will prioritize a collection system at Retail Pharmacies and law enforcement agencies as well as community collection events along with Mail-Back Services available at public buildings.

All drop-off sites shall accept all Covered Drugs from County Residents during all hours that the Collector is normally open for business to the public.

Inmar will utilize hospitals with on-site retail pharmacies and law enforcement agencies as necessary to meet the goals of equitable and reasonably convenient access for County Residents, as outlined in § B11-545(b)(1). However, it is our expectation that the majority of drop-off sites will be Retail Pharmacies.

### A. Kiosks

Pursuant to the Ordinance §B11-545(b) (2), Inmar complies with DEA regulation 21 CFR Parts 1317.60(c) and 1317.70(f), and seals all drop-box liners and Mail-Back envelopes. These liners and envelopes shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly,

their contents shall not be sorted or inventoried subsequent to being placed into a drop-box or mail-back envelope. Patient Privacy is addressed more specifically in Section V.

Pursuant to the Ordinance §B11-545(b)(3-4), Inmar will give preference to Retail Pharmacies and law enforcement agencies wherever possible to voluntarily serve as drop-off sites for Unwanted Covered Drugs. Inmar will work with all Collectors to validate that the requirements in §B11-545 including all relevant DEA and State of California Board of Pharmacy requirements are met.

### **Kiosk Specifications and Design**

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

There are several unique features that enhance the effectiveness and security of the Inmar kiosk. For example, the top of the kiosk is sloped, limiting the ability to stack items on top. In addition, the drop slot features an extended metal drop door that lowers into the container to detect when product capacity is reached. When the drop door encounters resistance within the kiosk, it is an indication that it is time to change the container. This manual capacity indicator eliminates the need to change batteries and/or sacrifice the location of the kiosk to be proximate to an electrical outlet. Lastly, the container access door is reversible to allow for convenient placement in any appropriate location in the Pharmacy.

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

The Inmar kiosk will have signage that communicates what is and is not allowed to be placed inside, as defined by §B11-540. Definitions. The signage will also feature a website and toll-free phone number (detailed further in Section IV) so users of the program can ask questions and locate additional program information.

Inmar's DEA and ADA compliant kiosk is sent to the authorized Collector along with enough supplies for 3 returns. Supplies include:

- Preaddressed, prepaid serialized container
- Serialized inner liners to protect against puncture and provide a liquid barrier

- Easy-to-use zip ties to seal inner liner compliantly
- Absorbent pad for placement in the bottom of the inner liner bag

**Kiosk design features**



**Kiosk Components**



### **Pick-Up and Disposal Coordination Options**

For the safe on-site removal of contents and servicing of kiosks, Inmar abides by the DEA regulations in 21 CFR 1300 et al.

Inmar will work with each authorized Collector to develop a collection schedule that works specifically for their location - either an on-site or self-service option. Inmar will also be at the ready with service technicians should emergency service be required. For a pickup request outside of the normal schedule, the standard response time is 48 hours. Regardless of the service model chosen, Inmar, with its contracted disposal partners, will provide direct feedback using discrepancy reports to prompt any corrective action needed should liners reach disposal facilities in a non-compliant manner, i.e. taped incorrectly, overweight, etc. Feedback is communicated directly to pharmacy locations as well as any technicians who may have assisted or serviced a return as described below. Any discrepancies will be included as required in the annual reports.

### **Self-Service Returns**

As provided for by the CA Board of Pharmacies, Inmar will train authorized Collectors to service the containers on their own to allow for expedited servicing as desired. The steps to service a container are fast, efficient, and DEA-compliant. Inmar will provide authorized Collectors with training materials including step-by-step instructions for tracking, sealing, shipping, and replacing collection containers. Training materials are provided in Appendix A. The process for the pharmacy once a Kiosk is installed is as follows:

- Pharmacist receives the liner kit
- Pharmacy team (consisting of 2 pharmacy employees) constructs the container with inner liner, inserts and securely locks the kiosk
- Pharmacy team unlocks the kiosk drop door to enable consumer use
- Installation date of inner liner is documented and witnessed by on Tracking Sheet (Included in Appendix A)
- Once kiosk is full, pharmacy team members will jointly open kiosk
- Container and inner liner is removed and documented on the Tracking Sheet.
- Container is packaged (inner liner is zip tied, outer box is taped) to be compliant with all DOT Hazardous Materials Regulations
  - The sealer inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.
- If the container (and inner liner) must be shipped at a later time (shipment cannot take place at time of service), storage of the container behind pharmacy counter must be notated on the Tracking Sheet
- Replacement container and inner liner is constructed, inserted, secured into kiosk and documented on the Tracking Sheet
- Pharmacy team contacts FedEx for pickup of container (and inner liner) for shipping to authorized Disposal Facility for destruction

\*At no point will the pharmacy have to store the filled container for longer than 48 hours after calling FedEx.

### Technician-Assisted Returns

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

- Pharmacist team receives the liner kit
- Pharmacy team contacts preassigned technician staff to construct container with inner liner, insert and securely lock kiosk with 2 pharmacy employee witnesses.
- Technician unlocks the kiosk drop door to enable consumer use
- Once the kiosk is full (or until routine schedule is established), pharmacy team contacts preassigned Inmar technician for service
- Upon arrival, technician will observe the condition of the kiosk
- Technician will notify pharmacy team of arrival
- Pharmacy team witnesses technician change out of kiosk supplies
- Container and inner liner is removed and documented on the Tracking Sheet.
- Container is packaged (inner liner is zip tied, outer box is taped) to be compliant with all DOT Hazardous Materials Regulations
- The sealer inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.
- If the container (and inner liner) must be shipped at a later time (shipment cannot take place at time of service), storage of the container behind pharmacy counter must be notated on the Tracking Sheet.
- Replacement container and inner liner is constructed, inserted, secured into kiosk and documented on the Tracking Sheet
- Pharmacy team contacts FedEx for pickup of container (and inner liner) for shipping to authorized Disposal Facility for destruction
- Technician will perform general clean-up and wipe-down of kiosk
- Notation of container serial number removed, and serial number installed along with signatures by 2 pharmacy employees (witnesses)
- Sealed container (and inner liner) will be placed behind the pharmacy counter to await FedEx pick up and documented accordingly on the Tracking Sheet\*
- Final signature from pharmacy personnel of completion of service event is obtained

\*At no point will the Pharmacy have to store the filled container for longer than 48 hours after calling FedEx.

### Full-Service Returns

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

Inmar will provide two employees with all appropriate DEA and DOT function specific training to specifically service kiosks. Upon installation of the Kiosk, the process for Full-Service Events will include the following:

- Pharmacist receives the liner kit
- Pharmacist contacts preassigned Full Service staff to construct container with inner liner, insert and securely lock kiosk.
- Full Service staff will unlock the kiosk drop door to enable consumer use
- Once the kiosk is full (or until routine schedule is established), pharmacist contacts preassigned Full Service Staff service
- Upon arrival, Full Service staff will observe the condition of the kiosk
- Full Service staff will notify pharmacist of arrival
- Full Service staff will remove the container and inner liner and document on the Tracking Sheet.
- Container is packaged (inner liner is zip tied, outer box is taped) to be compliant with all DOT Hazardous Materials Regulations
- The sealer inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.
- Replacement container and inner liner is constructed, inserted, secured into kiosk and documented on the Tracking Sheet by the Full Service staff
- Full Service Staff will perform general clean-up and wipe-down of kiosk
- Full Service Staff will unlock the kiosk drop door to enable consumer use
- Installation date of inner liner is documented and on Tracking Sheet (Included in Appendix A)
- The sealer inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated
- Full container (and inner liner) will to be taken directly to FedEx by Full Service Staff to be sent directly to authorized Disposal Facility for destruction
- Final signature from pharmacists upon completion of the Full-Service Event is obtained

### **Auto-Replenishment of Kiosk Supplies**

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

Upon receipt of the liner at our destruction partner’s site, an electronic raw data file via SSH File Transfer Protocol (SFTP) with the weight, serialized barcoded label information and tracking information is passed to Inmar. This information is then received and entered into our Order Management log and Inbound Receipts log. The system tracks when the second of the three inner liners is received at the destruction partner. Inmar then initiates a reorder trigger for the next kit to

be shipped. Auto replenishment reduces the amount of inventory maintained at the Collector while maintaining sufficient supplies to keep the kiosk continuously operable. Additional considerations will be made for locations expected to have high volume of returns for multiple initial kits to insure an adequate supply of liners.



### Collector Site Locations

Inmar has an extensive retail network consisting of major retail partners (e.g. Safeway, Walmart and Rite Aid) and will leverage those relationships to engage participation in this Stewardship Plan. Appendix A includes a list of proposed locations that would utilize a kiosk as the collection method upon becoming a Collector.

Inmar will reach out to these retail Pharmacies as potential Collector sites and will utilize hospitals with on-site pharmacies, and law enforcement agencies as necessary to ensure equitable and reasonably convenient access to County Residents.

Inmar will work to establish drop-off sites within three months of the Collector's offer to participate unless the Collector requests a longer time frame.

## B. Mail-Back Services

✓ Ordinance No. NS-517.91 § B11-545(b)(5)

Pursuant to the Ordinance §B11-545(b)(5) Inmar will provide prepaid and preaddressed mailers to County Residents containing written instructions for returning Unwanted Covered Drugs. Mail-Back Services will be available, free of charge, to disabled and homebound County Residents upon request through the Stewardship Plan's toll-free telephone number and website, and through distribution of prepaid, preaddressed mailers at a minimum of five convenient Mail-Back Distribution Sites per County of Santa Clara Supervisorial District. This service will be available to all County Residents upon request.

### i. Mail-Back Distribution Sites

Return envelopes will be distributed at approved Mail-Back Distribution Sites. County Residents will be able to locate the Mail-Back Distribution Sites nearest to them on Inmar's LifeInCheck™ Consumer Covered Drug Take-Back program website, <https://rxdisposal.lifeincheck.com/>.

Inmar will establish Mail-Back Distribution Sites to supplement service in any area underserved by drop-off sites pursuant to § B11-545(b)(5).

Inmar is committed to providing all Pharmacies an option to supply their customers with information regarding Mail-Back Services. Inmar will provide Pharmacies, Doctor's offices, community services offices and law enforcement offices with small cards that can be handed out to County Residents that may need access to this service. The card will instruct them to either call or visit the website to locate the nearest kiosk or request a mailer. Additionally, Inmar will reach out to Pharmacies filling prescriptions by mail to include the cards for the same options. A sample card is provided below:

#### Sample Business Card – Request Mail-Back Envelope

**DO YOU NEED A DRUG MAIL-BACK ENVELOPE OR AN AUTO-INJECTOR COLLECTION UNIT?**

- 1** — Visit the following website:  
<https://rxdisposal.lifeincheck.com>
- 2** — Go to 'Ordering'
- 3** — Fill out the form to have your envelope or auto-injector collection unit shipped to you!

Inmar will also work with the Director, local law enforcement agencies, and local communities to determine the appropriate number Mail-Back Distribution Sites and their specific locations.

## ii. Requesting Return Envelopes or Auto-Injector containers

County Residents will be able to request mailers via Inmar's LifeInCheck™ Consumer Covered Drug Take-Back program website (<https://rxdisposal.lifeincheck.com/>) or the Inmar LifeInCheck™ Consumer Covered Drug Take-Back toll-free phone service.

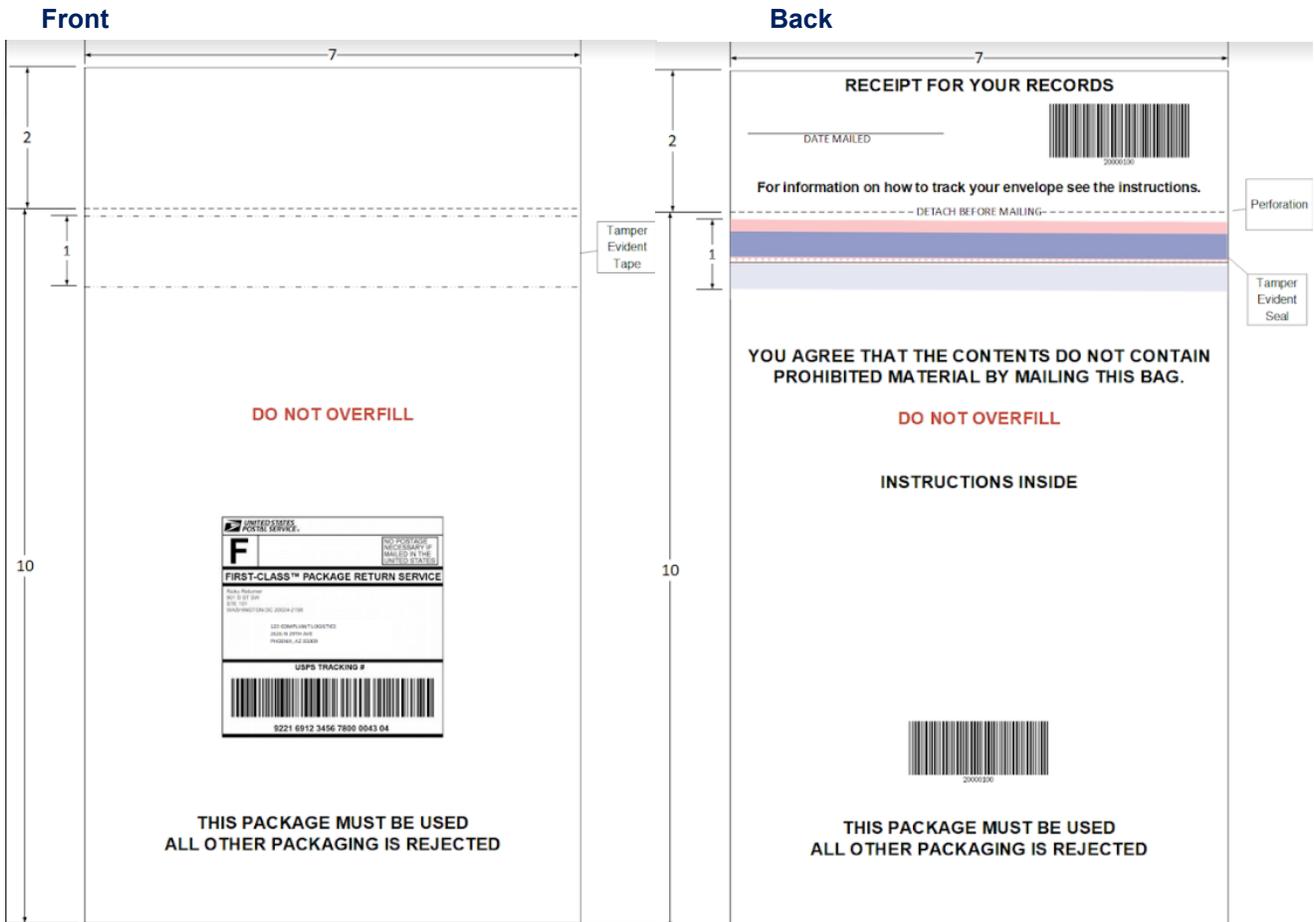
Mailers will meet DEA requirements:

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

Mailers are white in color with a gray interior and 7" x 10". The mailer includes a 3" perforated lip security seal. While only one size envelope is available at this time, should a County resident require more than one mailer, multiple mailers will be available via the program website, toll-free phone line or at Mail-Back Distribution Sites.

A sample envelope is shown on the next page

### Sample Envelope



### Mail-Back Tracking

All Mailers, regardless of type, distributed by authorized Mail-Back Distribution Sites will be tracked in a method similar to the kiosk collection containers. Mailers will have a unique, serialized identification number. Once the mailer arrives at the Disposal Facility, the serial number and weight will be noted before final disposition.

Mailers distributed directly to County Residents via the website or via toll-free phone number requests will be tracked by Inmar when sent to County Residents and tracked at the Disposal Facility when they are returned.

This tracking process will allow Inmar to report the number of mailers distributed and returned in the Annual Reporting provided to the Director, as required.

### Take-Back Events

Inmar will provide kiosks at regional locations convenient to the public and will conduct and promote Drug Take-Back Events in conjunction with a local law enforcement agency and in coordination with any National Consumer Drug Take-Back Day's promoted by the DEA if requested by the Directors,

## III. HANDLING AND DISPOSAL

✓ Ordinance No. NS-517.91 § B11-546

Pursuant to Ordinance §B11-546(a) Inmar complies with all local, state, and federal laws and regulations applicable to disposal of pharmaceutical waste and controlled substances.

Kiosk containers will be sent using Inmar's DOT Special Permit #20499, from the authorized Collector via FedEx to Inmar's third party contractor, 123 Compliance Logistics, LLC, a licensed DEA Reverse Distributor-Collector. All mailers will be sent via USPS to 123 Compliance Logistics. 123 Compliance Logistics will record the following information upon receipt of every individual container and mailer:

- Date received
- Serialized barcode label information
- Tracking information (Kiosk containers only)
- Weight
- Date transported to disposal facility
- Disposal Date
- Manifest number (if applicable)

All information recorded will be transferred back to Inmar on a daily basis as part of the electronic raw data file via SSH File Transfer Protocol (SFTP). Any discrepancies observed at 123 Compliance Logistics will be recorded on discrepancy reports to prompt any corrective action.

123 Compliance Logistics operates in full compliance with DEA § 1317.75(c) which prohibits handling substances after they have been deposited into a collection kiosk.

All product shipped directly to 123 Compliance Logistics will be transported using their contracted, licensed hazardous waste transporter, TransChem Environmental to the appropriate disposal facility to be incinerated quickly, securely, efficiently and in accordance with all DEA requirements. 123 Compliance Logistics will be responsible for all DEA Form 41 record keeping requirements. Please refer to the table below for the contracted disposal locations.

In reference to § B11-546(a)(b) "Stewardship Plans – Disposal of Unwanted Covered Drugs", 123 Compliance Logistics, TransChem Environmental and FedEx will comply with all local, state and federal laws and regulations surrounding the transportation and disposal of Unwanted Covered Drugs. Contact information and registration information is listed in the table below.

Company Name	Contact Information	Registration Information	Type of Incineration
<b>123 Compliant Logistics, LLC</b> 2626 N 29th Ave Phoenix, AZ 85009	Rory Buske 602-612-4140	DEA Reverse Distributor- Collector: R90571264	N/A
<b>Clean Harbors Aragonite</b> 11600N. Aptus Rd. Aragonite, UT94029	Michael Marlow 435-884-8100	EPA ID: UTD981552177	Hazardous Waste Incinerator
<b>Clean Harbors El Dorado, LLC</b> 309 Anerucan Circle El Dorado, AR 71730	Dan Roblee 870-863-7173	EPA ID: ARD069748192	Hazardous Waste Incinerator
<b>Veolia ES Technical Solutions, L.L.C</b> 7665 Highway 73 Port Aurthur, TX 77640	David Michaelis 281-216-9618	EPA ID: TXD000838896	Hazardous Waste Incinerator
<b>TransChem Environmental</b> 542 East 27 <sup>th</sup> Street Tuscon, AZ 85713	520-829-5651	DOT Registration: 052119550060B Hazardous Materials Safety Permit: US-1341480-AZ-HMSP	Hazardous Waste Transporter
<b>FedEx</b>	Eric Stillson 800-469-9993		Common Carrier

Copies of all relevant permits can be found in Appendix E

Information on FedEx's 5-year record of penalties, violations and/or regulatory orders received is detailed in its SEC filings found on <http://investors.fedex.com/financial-information/sec-filings/default.aspx>

## IV. POLICIES AND PROCEDURES

- ✓ Ordinance No. NS-517.91 § B11-542(d)
- ✓ Ordinance No. NS-517.91 § B11-545(b2)
- ✓ Ordinance No. NS-517.91 § B11-546(b-c)

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

Inmar Collectors and vendors will specifically be required to comply with The Controlled Substances Act, 21 USC sections 801-971 and 21 CFR Part 1317; United States Department of Transportation Hazardous Materials Regulation, 49 CFR parts 100-185 and all applicable Santa Clara County Ordinances and Regulations.

The DEA allows law enforcement agencies, Retail Pharmacies, Reverse Distributors, hospitals or clinics with onsite Pharmacies, and certain other entities to be registered with DEA as an authorized Collector.

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

### DOCUMENTATION AND TRACKING

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



Shipment from Inmar



Receipt at Collection Site



Storage and Use at Collection Site



Sealing and Shipment from Collection Site



Arrival and Destruction at Destruction Facility

Tracking is well documented as evidenced by the Inmar serialization tracking form which is referenced below. This form must be completed and witnessed by two authorized Collector employees, which assures compliance and safety across the program, and internally by both the Stewardship Organization and the Collector.

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

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #:					
Size of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #					
1 SERIAL NUMBER	2 Date Liner Acquired (1 Signature)	3 Date Liner Installed (2 Names & Signatures)		4 Date Removed (2 Names & Signatures)		5 Date Transferred to Storage (2 Names & Signatures)		6 Date Shipped (2 Names & Signatures)	
Ex: 32587	4/26/19 <i>John Jones</i>	4/26/19 John Jones <i>John Jones</i> Sally Smith <i>Sally Smith</i>		5/26/19 John Jones <i>John Jones</i> Sally Smith <i>Sally Smith</i>		5/26/19 John Jones <i>John Jones</i> Sally Smith <i>Sally Smith</i>		5/27/19 John Jones <i>John Jones</i> Sally Smith <i>Sally Smith</i>	

The purpose of this form is to document the use of the serialized inner liner throughout the collection process and to help the authorized Collector meet DEA and Board of Pharmacy record-keeping requirements. Inmar requires each authorized Collector to understand and comply with all federal, state, and local regulatory requirements pertaining to Unwanted Covered

Drugs applicable at the authorized Collector's registered location.

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

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

This tracking process will allow Inmar to report the number of collection-site-containers/inner liners distributed and returned in the Annual Reporting provided to Santa Clara County, as required.

### **Transport**

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

### **Disposal**

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

### **Compliance with Applicable Laws**

Inmar operates across 46 states and the District of Columbia and maintains compliance with all applicable federal, state, and local laws. Inmar, its vendors and Collectors will comply with the program requirements.

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

## V. PATIENT PRIVACY

- ✓ Ordinance No. NS-517.91 § B11-542(e)
- ✓ Ordinance No. NS-517.91 § B11-546(a)

Inmar provides significant training to our participating authorized Collectors and strictly follows the DEA guidelines for the proper handling of the kiosks and inner liners. This begins with the proper training of the authorized Collector in the compliant operation of the kiosks and proper preparation, removal, and packaging of the container. It also involves the training of the Inmar employees that may come into contact with the full container to ensure proper handling. Inmar is very strict in our compliance to the DEA guideline as cited below.

According to the DEA - As provided in §§1317.60(c) and 1317.70(f), inner liners shall be sealed immediately upon removal from the permanent outer container; sealed inner liners and returned Mail-Back Services packages shall not be opened, x-rayed, analyzed, or otherwise penetrated.

Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into a collection receptacle or Mail-Back Services package. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into a collection receptacle.

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

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



Inmar has a long history of serving both commercial and government clients with stringent compliance standards such as the protection of Protected Health Information (PHI) and HIPAA.

## VI. OUTREACH PROGRAM DESIGN

- ✓ Ordinance No. NS-517.91 § B11-542(f)
- ✓ Ordinance No. NS-517.91 § B11-547(a-e)

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness of the Stewardship Plan and maximize participation as required in § B11-547. In addition to preventative education, Inmar's strategy is designed to ensure that where and how to return Unwanted Covered Drugs is widely understood by County Residents, pharmacists, Retail Pharmacies, health care facilities and providers, veterinarians, and veterinary hospitals.

Inmar has a unique set of core capabilities, specifically in consumer marketing and activation. Thus, in addition to traditional outreach methods (signage, written materials, etc.), Inmar will drive participation among covered entities with modern, high-impact tactics such as influencer

marketing and targeted Media. Additionally, Inmar will provide onsite support at local outreach events sponsored by employers in the County.

Pursuant to § B11-547(a) (1), the individual components of Inmar's public outreach strategy are detailed below. Across all tactics, key messages will include, but not be limited to, the following:

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

In accordance with Sec. B11-542 (f), Inmar will coordinate promotional activities with other approved Plan Owner(s). Inmar will coordinate to ensure that residents clearly understand the logistics, safety and educational components of the Program. Inmar will coordinate educational outreach with other Plan Owners to ensure consistent messaging regarding the location of kiosks; safe disposal of medication; statistics regarding the dangers of pharmaceutical waste in the waste-stream, drug abuse statistics and other program advocacy; means of envelope distribution and any other pertinent information related to the success of the program. Inmar will coordinate with other Plan Owners to execute the Digital Media outreach and Social Influencer outreach, while the other plan operator focuses on traditional print and television media. This coordination will include the fair and equitable division of resources and ensure consistent messaging among the types of educational outreach. Inmar suggests the Plan Owners form a trade association to ensure that there are no inefficiencies or distortions due to collaboration. A trade association protects against the types of illegal agreements that can distort competition.

Inmar's LifeInCheck™ Consumer Drug Take-Back website will ensure that all interested parties can easily identify, understand, and access the collection services provided by Inmar and other Plan Operators. Coordination efforts will include providing a single website and toll-free telephone number to access information about collection services for all approved Stewardship Plans and include all existing kiosk locations in the County as a single repository.

## i. Educational & Outreach Materials

Inmar will equip pharmacies, healthcare facilities, and other interested community partners with easily-consumable educational and outreach materials for dissemination to covered entities upon request and at no charge.

These materials will:

- Provide instruction on how to safely store Covered Drugs at home
- Inform of the risks of disposing of Covered Drugs in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)

- Outline how to participate in the Covered Drug take-back program for safe disposal of Covered Drugs.

All materials will be easily understandable by covered entities with varying levels of English proficiency as well as be provided in Spanish, Japanese, Korean, Mandarin, Hindi, and Tagalog and will leverage explanatory graphics to aid in comprehension. Please see Appendix C for example materials.

## ii. Authorized Collector Marketing Support

To drive awareness and participation at a local level, Inmar will provide individual authorized Collectors with a variety of marketing assets at no charge, including in-store signage, social media content kits, press release templates, a radio ad script, and scripts for Pharmacy staff to let County Residents know that they can safely dispose of their Unwanted Covered Drugs at that location. Authorized Collectors will be able to request additional marketing materials through the help desk.

Please see Appendix D for example materials.

## iii. Website

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

Specifically, the website will:

- Leverage Inmar's collaboration with Google Maps to allow interested parties to find the nearest drop-off site or Mail-Back Distribution Site via an interactive map. The list of locations will be updated monthly to ensure accuracy.
- Include a location list inclusive of all kiosks located in the County including those operated by other Plan Operators.
- Allow interested parties to request prepaid mailers.
- Clearly indicate what substances are and are not accepted. Graphics of unacceptable substances are provided for additional clarity.
- Include educational and outreach materials promoting safe storage of Covered Drugs
- Feature links to LifeInCheck™ Consumer Drug Take-Back social media pages for more useful content.

Retailers or pharmacies interested in participating in the Stewardship Plan will request information through the website. In addition, current authorized Collectors have access to resources for compliant kiosk management (including installation, tracking and shipping).

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

#### iv. Toll-Free Number

Inmar will operate a multi-lingual, (English, Spanish, Japanese, Korean, Mandarin, Hindi, and Tagalog), toll-free call center that interested parties can call to learn more about the Stewardship Plan, Take-Back Events, and best practices for disposal of Unwanted Covered Drugs. The call center is operated with live operators and will be staffed with a third party service to assist with live translation in the required languages. All operators are trained to assist an answer questions related to any and all questions related to the Stewardship Plan operation including but not limited to Authorized Collector kiosk support and service requests. County Residents will also be able to request information about the nearest drop-off site or Mail-Back Distribution Site, or request that a prepaid mailer is sent to them.

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

#### v. Social Influencer Marketing

Inmar is able to execute robust, data-driven social influencer marketing programs that activate shoppers and patients alike. On average, Inmar executes approximately 500 such programs annually.

Inmar has a curated network of more than 12,000 highly-vetted influencers who are experts at creating authentic, compelling content that drives awareness and inspires program participation among County Residents. Inmar utilizes sophisticated influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the County Residents receiving the content are the ones most inclined to take action.

Content can focus on an array of topical themes, however, Inmar's recommendation would be one, or a combination of, the following:

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

Inmar executed a social influencer marketing program promoting drug take-back in April of 2019 which yielded exceptional results (see Sub-Section 7 for more information on impact measurement and reporting). The campaign generated 11.4MM impressions, but, more importantly, the posts themselves were highly engaging. The average click-through-rate (CTR) was 4.5% (a historical CTR benchmark in this category is 1.5 - 2.0%) and users spent an average of one minute and eight seconds on each post. Both metrics suggest users found the content compelling and useful. ROI for social influencer marketing campaigns is measured in

terms of return on Total Media Value (the combined value of earned and paid media for the campaign). In this case, TMV return was favorable at 2.1x.

Please see Appendix D for sample social influencer content.

## vi. Targeted Media

Inmar's expert paid media team actively monitors social influencer content for the highest performers - looking beyond vanity metrics to focus on deeper measurements such as views and engagements. The most engaging content is promoted across social platforms as well as off-site Media to amplify the message around Covered Drug take-back to a targeted cohort of interested parties.

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

## vii. Impact Measurement

Inmar will provide a description of outreach initiatives in its annual report, but also aims to provide more frequent and actionable reporting on the impact of such initiatives.

With specific regard to social influencer marketing and targeted Media, Inmar's measurement tools and philosophies provide transparency and quantifiability over vanity metrics and theoretical explanations.

Reporting will include:

- Third-party-verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

## viii. Collection Kiosk Signage

The collection kiosks themselves will be readily-recognizable. The standard color for the kiosks is bright green for easy identification, and each kiosk is adorned with clear graphical instructions in English,

Spanish, Japanese, Korean, Mandarin, Hindi, and Tagalog. Please see Appendix B for an image of the collection kiosk and disposal instructions.

## ix. Biennial Survey

Inmar will conduct a biennial survey of Santa Clara County Residents as well as pharmacists, veterinarians, and health professionals who interact with patients on use of medicines after the first full year of operation of the Stewardship Plan. The aim of the survey questions will be to measure the percent awareness of the Stewardship Plan, assess to what extent drop-off sites and other collection methods are convenient and easy to use, and assess knowledge and attitudes about risks of abuse, poisonings, and overdoses from prescription and non-prescription drugs used in the home.

Draft survey questions will be submitted to the Director for review and comment at least 30 days prior to the initiation of the survey. Survey results and administration will adhere to the requirements specified by the Director per § B11-547. The privacy of all survey respondents shall be maintained.

## VII. PROGRAM GOALS

✓ Ordinance No. NS-517.91 § B11-542(g)

Inmar’s goals are outlined below with both tables. These goals are aimed at providing excellent services over the beginning and extended life of this proposal.

**Table 1: Program Collection Goals**

6 Months	12 Months
<ul style="list-style-type: none"> <li>• Initiate program operation</li> <li>• Increase authorized Collector drop-off sites in population centers and areas outside of population centers.</li> <li>• Help achieve the convenience standard collectively with the existing provider.</li> </ul>	<ul style="list-style-type: none"> <li>• Inmar’s goal is 100 kiosks placed collectively across the County to provide equitable and reasonably convenient access to County Residents. If this goal cannot be met, underserved areas will be targeted for Mail-Back Distribution Sites or Take-Back Events.</li> <li>• Provide and communicate system for Pharmacies to request Mail-Back Service envelopes.</li> </ul>

**Table 2: Program Promotion Goals**

Complete	6 Months	12 Months	18 Months
<ul style="list-style-type: none"> <li>• Website launch</li> </ul>	<ul style="list-style-type: none"> <li>• Website functionality</li> </ul>	<ul style="list-style-type: none"> <li>• Website functionality</li> </ul>	<ul style="list-style-type: none"> <li>• Website</li> </ul>

<ul style="list-style-type: none"> <li>Interested party educational materials</li> <li>Authorized Collector marketing support materials</li> </ul>	<p>updates</p> <ul style="list-style-type: none"> <li>Mail-Back Service envelope requests</li> <li>Educational materials uploaded</li> <li>Authorized Collector kiosk maintenance resources and requests</li> <li>Collector and Mail-Back Distribution Site list updated (ongoing)</li> <li>Initiate social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month)</li> </ul>	<p>updates</p> <ul style="list-style-type: none"> <li>Translation into specified languages</li> <li>Collection site and return envelope distribution site list updated (ongoing)</li> <li>Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month)</li> </ul>	<p>functionality updates</p> <ul style="list-style-type: none"> <li>Collector and Mail-Back Distribution Site updated (ongoing)</li> <li>Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ posts per month)</li> </ul>
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## VIII. DRUG SEPARATION & RECYCLING

✓ Ordinance No. NS-517.91 § B11-542(h)

DEA § 1317.75(c) prohibits handling substances after they have been deposited into a collection kiosk. For this reason, Inmar is unable to recycle drug packaging or separate covered drugs from packings. Inmar can, however, execute educational programs, as outlined in Section VI, to encourage County Residents to separate Unwanted Covered Drugs from their packaging and recycle the packaging prior to disposal.

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

## IX. ANNUAL REPORTS

✓ Ordinance No. NS-517.91 § B11-548(a-c)

✓ Regulation § 8 (A)

Inmar will submit an Annual Report in accordance with NS-517.91 § B11-548 and the Regulation

§ 8 (A) which will be submitted within six months after the end of the first 12-month period of the Stewardship Plan. It will also be submitted annually thereafter describing the plan's activities during the reporting period. The "reporting period" will be the 12 month period since the Stewardship Plan's approval for the first report and for all subsequent reports.

The report will include:

- i. Report Narrative with the following sections:
  - a. An executive summary providing a brief overview of the Stewardship Plan, proposals to improve the Stewardship Plan, challenged encountered during the reporting period, and how those challenges will be addressed in the next reporting period;
  - b. A summary of the Stewardship Plan's goals and the degree of success in meeting those goals, including a summary of efforts to meet the goals, any difficulties in meeting the goals, and if any goals have not been met, what efforts will be made in the next reporting period;
  - c. Identification of proposed goals to be accomplished in the next reporting period and if the proposed goals different from the original Stewardship Plan goals along with an explanation of why the goals have changed;
  - d. A description and summary of the Promotion System and hot it has been implemented;
  - e. A clearly marked "Safety and Security Report" identifying any known security or safety incidents at Drop-Off Sites, Take-Back Events and Mail-Back Distribution Sites, or during transportation or disposal of Unwanted Covered Drugs.
- ii. Report data with the following sections:
  - a. Identification of any changes to a Plan Operators contact information or its list of participating Producers;
  - b. For each Drop-off Site; the total weight of Unwanted Covered Drugs collected, the number of times Unwanted Drugs were picked up for transportation per location and the number of times a secure collection kiosk had to be locked because it reached capacity before its scheduled pickup;
  - c. For each Take-Back Event; its time, date, and location; how and when it was advertised; the total weight of Unwanted Covered Drugs collected; whether the secure collection kiosk reached capacity before the end of the Take-Back Event; and how the Unwanted Covered Drugs collected at the Take-Back Event were handled prior to disposal;
  - d. The total weight of Unwanted Covered Drugs transported by each Transporter and disposed of by each Disposal facility;
  - e. Foer each Medium used in the Promotion System: Target Rating Points and documentation verifying that outreach described by the Promotion System did in fact take place.

The program's annual expenditures will be dependent on the final agreement between Santa

Clara County and Inmar.

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# APPENDIX

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A. Potential Collection Sites	27
B. Kiosk Signage	32
C. Training Materials	34
D. Promotion Materials	55
E. Applicable Permits and Licenses	62

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## Appendix A: Potential Collection Sites

Store Name	Store Address	Store City	Status
<b>DBA: WALGREENS # 07088</b>	303 2ND ST	LOS ALTOS	In Discussions
<b>LUCKY PHARMACY #723</b>	2175 GRANT RD	LOS ALTOS	In Discussions
<b>SAFEWAY PHARMACY #2814</b>	160 1ST STREET	LOS ALTOS	Agreed
<b>RITE AID #5886</b>	2310 HOMESTEAD RD STE A	LOS ALTOS	Notified
<b>CAMINO PHARMACY</b>	701 E. EL CAMINO REAL	MOUNTAIN VIEW	Notified
<b>CVS PHARMACY # 16113</b>	555 SHOWERS DR	MOUNTAIN VIEW	Notified
<b>DBA: WALGREENS # 00689</b>	121 E EL CAMINO REAL	MOUNTAIN VIEW	Notified
<b>DBA: WALGREENS #13948</b>	1905 W. EL CAMINO REAL	MOUNTAIN VIEW	Notified
<b>EL CAMINO HOSPITAL OUTPATIENT PHARMACY</b>	2500 GRANT ROAD	MOUNTAIN VIEW	Notified
<b>SAFEWAY PHARMACY #2948</b>	645 SAN ANTONIO RD	MOUNTAIN VIEW	Agreed
<b>WAL-MART PHARMACY 10-2280</b>	600 SHOWERS DR	MOUNTAIN VIEW	Notified
<b>DBA COSTCO PHARMACY #143</b>	1000 N. RENGSTORFF AVENUE	MOUNTAIN VIEW	Notified
<b>SAFEWAY PHARMACY #0705</b>	570 N SHORELINE BLVD	MOUNTAIN VIEW	Agreed
<b>CVS PHARMACY # 17583</b>	298 W MC KINLEY AVE	SUNNYVALE	Notified
<b>DBA COSTCO PHARMACY #423</b>	150 LAWRENCE STATION ROAD	SUNNYVALE	Notified
<b>LUCKY PHARMACY #780</b>	484 NORTH MATHILDA	SUNNYVALE	In Discussions
<b>DBA: WALGREENS # 03380</b>	1306 S MARY AVE	SUNNYVALE	Notified
<b>DBA: WALGREENS # 07080</b>	105 E EL CAMINO REAL	SUNNYVALE	Notified
<b>DBA: WALGREENS #09782</b>	780 E EL CAMINO REAL	SUNNYVALE	Notified
<b>SAFEWAY PHARMACY #1196</b>	639 SOUTH BERNARDO AVE	SUNNYVALE	Agreed
<b>SAFEWAY PHARMACY #1439</b>	785 E. EL CAMINO REAL	SUNNYVALE	Agreed
<b>SAFEWAY PHARMACY #2887</b>	150 E. EL CAMINO REAL	SUNNYVALE	Agreed
<b>COMMUNITY, A WALGREENS PHARMACY #21141</b>	217 ALMA ST STE 200	PALO ALTO	Notified
<b>DBA: CVS/PHARMACY # 03935</b>	855 EL CAMINO REAL	PALO ALTO	Notified

<b>DBA: WALGREENS #13596</b>	300 UNIVERSITY AVE	PALO ALTO	Notified
<b>MEDICAL PLAZA PHARMACY</b>	211 QUARRY ROAD	PALO ALTO	Notified
<b>DBA: WALGREENS # 03344</b>	4170 EL CAMINO REAL	PALO ALTO	Notified
<b>DBA: WALGREENS # 06869</b>	2605 MIDDLEFIELD ROAD	PALO ALTO	Notified
<b>SAFEWAY PHARMACY #1682</b>	2811 MIDDLEFIELD ROAD	PALO ALTO	Agreed
<b>CAMDEN PHARMACY</b>	3189 S. BASCOM AVE	CAMPBELL	Notified
<b>DBA: WALGREENS # 02957</b>	1660 WINCHESTER BLVD	CAMPBELL	Notified
<b>DBA: WALGREENS # 06585</b>	1570 W CAMPBELL AVE	CAMPBELL	Notified
<b>SAFEWAY PHARMACY #1293</b>	2341 SO. WINCHESTER BLVD	CAMPBELL	Agreed
<b>SAFEWAY PHARMACY #3241</b>	950 W HAMILTON AVE	CAMPBELL	Agreed
<b>DBA CVS/PHARMACY #17687</b>	19499 STEVENS CREEK BLVD	CUPERTINO	Notified
<b>DBA: WALGREENS # 04416</b>	20011 BOLLINGER ROAD	CUPERTINO	Notified
<b>KML PHARMACY INC</b>	1655 S DEANZA BLVD	CUPERTINO	Notified
<b>RITE AID #5967</b>	20572 HOMESTEAD ROAD	CUPERTINO	Notified
<b>SAFEWAY PHARMACY #3251</b>	20620 HOMESTEAD RD	CUPERTINO	Agreed
<b>CVS PHARMACY # 16971</b>	6705 CAMINO ARROYO	GILROY	Notified
<b>DBA COSTCO PHARMACY #760</b>	7251 CAMINO ARROYO	GILROY	Notified
<b>DBA: WALGREENS #09516</b>	770 1ST ST	GILROY	Notified
<b>MEDICAL PAVILION PHARMACY</b>	9460 N NAME UNO STE 100	GILROY	Notified
<b>WAL-MART PHARMACY 10-2002</b>	7150 CAMINO ARROYO	GILROY	Notified
<b>DBA: WALGREENS # 07326</b>	423 N SANTA CRUZ AVE	LOS GATOS	Notified
<b>PHARMACA INTEGRATIVE PHARMACY, INC.</b>	54 N. SANTA CRUZ AVE.	LOS GATOS	Notified
<b>DBA: WALGREENS # 02786</b>	14100 BLOSSOM HILL ROAD	LOS GATOS	Notified
<b>RITE AID #5972</b>	15920 LOS GATOS BOULEVARD	LOS GATOS	Notified
<b>SAFEWAY PHARMACY #1245</b>	15549 UNION AVE	LOS GATOS	Agreed
<b>SAFEWAY PHARMACY #2815</b>	470 N. SANTA CRUZ AVE.	LOS GATOS	Agreed
<b>DBA: WALGREENS # 03671</b>	342 W CALAVERAS BLVD	MILPITAS	Notified
<b>DBA: WALGREENS # 05480</b>	1833 N. MILPITAS BLVD.	MILPITAS	Notified
<b>SAFEWAY PHARMACY #1879</b>	555 E CALAVERAS BLVD	MILPITAS	Agreed
<b>TRI-CITY PHARMACY</b>	1132 CADILLAC CT	MILPITAS	Notified
<b>WAL-MART PHARMACY 10-2119</b>	301 RANCH DR	MILPITAS	Notified
<b>CVS PHARMACY # 17327</b>	1061 COCHRANE RD	MORGAN HILL	Notified

<b>DBA: WALGREENS # 04516</b>	745 E DUNNE AVE	MORGAN HILL	Notified
<b>RITE AID #5975</b>	16000 MONTEREY STREET	MORGAN HILL	Notified
<b>SAFEWAY PHARMACY #1455</b>	840 E. DUNNE AVE	MORGAN HILL	Agreed
<b>SAFEWAY PHARMACY #1891</b>	235 TENNANT STATION	MORGAN HILL	Agreed
<b>WAL-MART PHARMACY 10-5766</b>	170 COCHRANE PLAZA	MORGAN HILL	Notified
<b>CVS PHARMACY # 17658</b>	2004 EL CAMINO REAL	SANTA CLARA	Notified
<b>DBA COSTCO PHARMACY #129</b>	1601 COLEMAN AVE	SANTA CLARA	Notified
<b>DBA: CVS/PHARMACY # 09262</b>	222 SARATOGA AVE	SANTA CLARA	Notified
<b>DBA: CVS/PHARMACY # 09944</b>	3081 STEVENS CREEK BLVD	SANTA CLARA	Notified
<b>DBA: WALGREENS # 02612</b>	200 N WINCHESTER BLVD	SANTA CLARA	Notified
<b>DBA: WALGREENS #15246</b>	2140 EL CAMINO REAL	SANTA CLARA	Notified
<b>DBA: WALGREENS # 02740</b>	3460 EL CAMINO REAL	SANTA CLARA	Notified
<b>HAN'S PHARMACY</b>	3423 EL CAMINO REAL	SANTA CLARA	Notified
<b>KAISER PERMANENTE PHARMACY #414</b>	710 LAWRENCE EXPRESSWAY 4TH FL	SANTA CLARA	In Discussions
<b>LUCKY PHARMACY #773</b>	3705 EL CAMINO REAL	SANTA CLARA	Notified
<b>RITE AID #5976</b>	2620 EL CAMINO REAL	SANTA CLARA	Notified
<b>SAFEWAY PHARMACY #1990</b>	3970 RIVERMARK PLAZA	SANTA CLARA	Agreed
<b>WALMART PHARMACY 10-3123</b>	3255 MISSION COLLEGE BLVD	SANTA CLARA	Notified
<b>CVS PHARMACY # 17176</b>	533 COLEMAN AVE	SAN JOSE	Notified
<b>FRIENDLY PHARMACY INC</b>	485 LEWIS RD STE D	SAN JOSE	Notified
<b>LION PHARMACY INC</b>	2857 SENTER RD SUITE A	SAN JOSE	Notified
<b>DBA COSTCO PHARMACY #148</b>	2201 SENTER RD	SAN JOSE	Notified
<b>DBA: WALGREENS # 04372</b>	780 E SANTA CLARA STREET	SAN JOSE	Notified
<b>DOWNTOWN PHARMACY INC</b>	60 N 13TH ST STE A	SAN JOSE	Notified
<b>MEGA DRUGS</b>	696 E SANTA CLARA STREET	SAN JOSE	Notified
<b>WALMART PHARMACY 10-4174</b>	1450 MONTEREY RD.	SAN JOSE	Notified
<b>DBA: WALGREENS # 05454</b>	1661 MCKEE RD	SAN JOSE	Notified
<b>DBA COSTCO PHARMACY #470</b>	5301 ALMADEN EXPRESSWAY	SAN JOSE	Notified
<b>DBA: WALGREENS # 03378</b>	1376 KOOSER ROAD	SAN JOSE	Notified
<b>DBA: WALGREENS #12548</b>	1130 FOXWORTHY AVE.	SAN JOSE	Notified
<b>SAFEWAY PHARMACY #0997</b>	1663 BRANHAM LANE	SAN JOSE	Agreed
<b>WAL-MART PHARMACY 10-5884</b>	5095 ALMADEN EXPY	SAN JOSE	Notified
<b>DBA COSTCO PHARMACY #1267</b>	6898 RALEIGH ROAD	SAN JOSE	Notified

<b>KAISER ONCOLOGY PHRMCY #638</b>	270 INTERNATIONAL CIR, 1ST FLR	SAN JOSE	In Discussions
<b>LUCKY PHARMACY #759</b>	129 BERNAL ROAD	SAN JOSE	In Discussions
<b>RITE AID #5983</b>	6215 SANTA TERESA BOULEVARD	SAN JOSE	Notified
<b>RITE AID #5984</b>	6091 MERIDIAN AVENUE	SAN JOSE	Notified
<b>SAFEWAY PHARMACY #0695</b>	6477 ALMADEN RD	SAN JOSE	Agreed
<b>CVS PHARMACY # 17314</b>	3155 SILVER CREEK RD	SAN JOSE	Notified
<b>DBA: WALGREENS # 01179</b>	1795 E. CAPITOL EXP	SAN JOSE	Notified
<b>LEXANN PHARMACY INC.</b>	1569 LEXANN AVE STE 104	SAN JOSE	Notified
<b>LINDA RX PHARMACY</b>	1569 LEXANN AVE STE 130	SAN JOSE	Notified
<b>RITE AID #5985</b>	1029 EAST CAPITOL EXPRESSWAY	SAN JOSE	Notified
<b>TULLY MEDICAL CLINIC PHARMACY</b>	1693 FLANIGAN DR	SAN JOSE	Notified
<b>CVS PHARMACY # 17100</b>	1750 STORY RD	SAN JOSE	Notified
<b>DBA: WALGREENS # 02081</b>	1760 STORY ROAD	SAN JOSE	Notified
<b>NOWRX INC.</b>	1310 TULLY RD STE 101	SAN JOSE	Notified
<b>PRESCRIPTION HEADQUARTERS INC</b>	1340 TULLY ROAD	SAN JOSE	Notified
<b>VIET TOWN PHARMACY</b>	999 STORY RD UNIT 9024	SAN JOSE	Notified
<b>CVS PHARMACY # 17045</b>	879 BLOSSOM HILL RD	SAN JOSE	Notified
<b>CVS PHARMACY # 17588</b>	5630 COTTLE RD	SAN JOSE	Notified
<b>DBA: WALGREENS # 02739</b>	440 BLOSSOM HILL	SAN JOSE	Notified
<b>LUCKY PHARMACY #763</b>	844 BLOSSOM HILL RD	SAN JOSE	In Discussions
<b>SAFEWAY PHARMACY #2900</b>	5760 COTTLE ROAD	SAN JOSE	Agreed
<b>CVS PHARMACY # 16115</b>	1811 HILLSDALE AVE	SAN JOSE	Notified
<b>DBA: WALGREENS # 02384</b>	2680 UNION AVE	SAN JOSE	Notified
<b>LUCKY PHARMACY #757</b>	2027 CAMDEN AVE	SAN JOSE	In Discussions
<b>RITE AID #5987</b>	3171 MERIDIAN AVENUE	SAN JOSE	Notified
<b>STANFORD SOUTH BAY CANCER CENTER PHARMAC</b>	2589 SAMARITAN DRIVE ROOM 4205	SAN JOSE	Notified
<b>CVS PHARMACY # 17355</b>	2161 MONTEREY HWY	SAN JOSE	Notified
<b>DBA: WALGREENS # 02265</b>	1130 BIRD AVE	SAN JOSE	Notified
<b>DBA: WALGREENS # 07079</b>	1615 MERIDIAN AVE	SAN JOSE	Notified
<b>RITE AID #5988</b>	1550 HAMILTON AVENUE	SAN JOSE	Notified

<b>SAFEWAY PHARMACY #1483</b>	1530 HAMILTON AVENUE	SAN JOSE	Agreed
<b>DBA: WALGREENS # 03754</b>	1399 W SAN CARLOS	SAN JOSE	Notified
<b>SAFEWAY PHARMACY #1476</b>	1300 W SAN CARLOS ST	SAN JOSE	Agreed
<b>LUCKY PHARMACY #233</b>	3457 MCKEE RD	SAN JOSE	In Discussions
<b>RITE AID #5992</b>	1030 SOUTH WHITE ROAD	SAN JOSE	Notified
<b>COMMUNITY, A WALGREENS PHARMACY #21193</b>	1757 W SAN CARLOS ST.	SAN JOSE	Notified
<b>RITE AID #5993</b>	1333 SOUTH WINCHESTER BLVD	SAN JOSE	Notified
<b>SCVH&amp;HS REFILL CTR PHARMACY</b>	871 ENBORG COURT	SAN JOSE	Notified
<b>CVS PHARMACY # 16763</b>	1600 SARATOGA AVE., STE 601	SAN JOSE	Notified
<b>DBA: WALGREENS # 00840</b>	1334 SARATOGA AVENUE	SAN JOSE	Notified
<b>SAFEWAY PHARMACY #1465</b>	5146 STEVENS CREEK BLVD	SAN JOSE	Agreed
<b>WALMART PHARMACY 10-2486</b>	4080 STEVENS CREEK BLVD.	SAN JOSE	Notified
<b>COSTCO PHARMACY #1004</b>	1709 AUTOMATION PARKWAY	SAN JOSE	Notified
<b>DBA: WALGREENS # 00900</b>	2105 MORRILL AVENUE	SAN JOSE	Notified
<b>DBA: WALGREENS # 00842</b>	350 N CAPITOL AVE	SAN JOSE	Notified
<b>CVS PHARMACY # 17582</b>	95 HOLGER WAY	SAN JOSE	Notified
<b>WAL-MART PHARMACY 10-3023</b>	4055 EVERGREEN VILLAGE SQUARE	SAN JOSE	Notified
<b>LUCKY PHARMACY #758</b>	565 WEST CAPITOL EXPRESSWAY	SAN JOSE	In Discussions
<b>SAFEWAY PHARMACY #0316</b>	179 BRANHAM LANE	SAN JOSE	Agreed
<b>SAFEWAY PHARMACY #4905</b>	6100 HELLYER AVE	SAN JOSE	Agreed
<b>DBA: WALGREENS # 03445</b>	2799 S WHITE RD	SAN JOSE	Notified
<b>SAFEWAY PHARMACY #3095</b>	2980 E CAPITAL EXPRESSWAY	SAN JOSE	Agreed

# Appendix B: Kiosk Signage



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

**1** Pull to open drawer *Jale para abrir el cajón* ▶ **2** Place medications inside *Coloque los medicamentos adentro* ▶ **3** Close the drawer *Cierre el cajón*

**ACCEPTED (ACEPTADOS)**

Unused or expired prescription medication  
(Including Schedule II-V controlled substances)  
*Medicamentos con receta no consumidos o vencidos (incluidas las sustancias controladas de clasificación II a V)*

Unused or expired over-the-counter medication  
*Medicamentos de venta libre, no consumidos o vencidos*

Pet Medication  
*Medicamentos para mascotas*

**NOT ACCEPTED (NO ACEPTADOS)**

Schedule I controlled substances  
*Sustancias controladas de clasificación I*

Illegal drugs  
*Drogas ilegales*

Mercury-Containing Thermometers  
*Termómetros de Mercurio*

Needles  
*Agujas*



## DRUG DISPOSAL PROGRAM (PROGRAMA DE ELIMINACIÓN DE DROGAS)

See Directions on Top of Box (Instrucciones arriba de la caja)

For more information,  
visit [rxdisposal.lifeincheck.com](http://rxdisposal.lifeincheck.com) or call 1-888-371-0717



We are proud to work with this location in support of the Consumer Drug Take-Back Program.

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

## DID YOU KNOW?

**184**

Americans die every day from a **drug overdose**

\*cdc.gov

**18 Million**

People in the **U.S.** over the age of 12 have misused medications at least once in the past year.

\*drugabuse.gov

**51%**

of misused prescription pain relievers are given by, bought from or taken from a **friend or relative.**

\*samhsa.gov

**46 Million**

Americans are exposed to trace amounts of medications in their **drinking water.**

\*Associated Press

## TOGETHER, WE CAN MAKE A DIFFERENCE!

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

For more information, visit [rxdisposal.lifeincheck.com](https://rxdisposal.lifeincheck.com) or call 1-888-371-0717



## Appendix C: Training Material

Training material provided to authorize Collectors include:

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

All of the aforementioned documents are provided on the following pages.



# FAQS FOR CONSUMER DRUG TAKE-BACK

## CONSUMER DRUG TAKE-BACK CLIENT SERVICE TEAM

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

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# WHAT TO EXPECT AS A NEW INMAR CONSUMER DRUG TAKE-BACK PROGRAM CLIENT



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



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



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



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



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

## FREQUENTLY ASKED QUESTIONS

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

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

(800) 350-0396 Option 6 • Mon - Fri 8am-5pm EST

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## Installation / Removal

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

## Installation / Removal Continued

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

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

(800) 350-0396 Option 6 • Mon - Fri 8am-5pm EST

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

## Compliance / Regulatory

Question	Answer
10 Is there a statement from the DEA allowing for video monitoring of the receptacle?	There is no statement allowing video surveillance. However, the regulations state that regular monitoring by employees is required. This is the exact text from the Regulation Part 1317 Subpart B (1317.75 2(i)): "(i) At a hospital/clinic: A collection receptacle shall be located in an area regularly monitored by employees, and shall not be located in the proximity of any area where emergency or urgent care is provided." VIDEO MONITORING IS NOT ALLOWED IN CALIFORNIA (not part of DEA regulation).
11 Are the items collected considered medical waste?	Household pharmaceuticals collected by take-back programs are not considered medical waste and, therefore, not subject to EPA RCRA rules. The items collected are considered household waste as long as the take-back program rules are followed. That is, no sharps, non-pharmaceuticals, etc. allowed in the receptacles.

## Compliance / Regulatory Continued

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

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

(800) 350-0396 Option 6 • Mon - Fri 8am-5pm EST

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Question	Answer
12	What should the pharmacist do if they see someone put a "not allowed" substance or item in the receptacle? Those responsible for monitoring the receptacle should do their best to keep this from occurring. However, the DEA specifies opening the inner liner is not allowed.
13	Can non-controlled medications and controlled substances be placed in the LifeInCheck Consumer Drug Take-Back receptacle? Yes. Comingling of controlled and non-controlled substances is allowed in the take-back receptacle.
14	If a patient asks the pharmacist to place their medications in the receptacle, can they do so? With an exception for personnel in a long term care facility, the drug owner or a member of his/her household are the only persons allowed to place items in the take-back receptacle.
15	Where can I find information on DEA regulations? You can access links for DEA registrants, LTCFs and more here: <a href="https://www.deadiversion.usdoj.gov/drug_disposal/index.html">https://www.deadiversion.usdoj.gov/drug_disposal/index.html</a> .
16	Are there any regulations limiting the number of keys I can replicate for these units? The DEA does not specify anything regarding the keys, only that the receptacle is secure, monitored and that two staff members are present when it is opened.

## Marketing / Promotion

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

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

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

(800) 350-0396 Option 6 • Mon - Fri 8am-5pm EST

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LIFE **IN** CHECK™  
CONSUMER DRUG TAKE-BACK

# COLLECTION CONTAINER VISUAL INSTRUCTIONS

## CONSTRUCTION, INSTALLATION, REMOVAL AND SHIPPING OF COLLECTION CONTAINER

# CALIFORNIA GUIDELINES

Questions: Contact Consumer Drug Take-Back Client Service Team  
[take-back@inmar.com](mailto:take-back@inmar.com)

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

# KIT CONTENTS

Each shipment contains 3 individually packaged kits with unique components to each kit.

**DO NOT** rearrange contents between kits.

## THE KIT:

- 1 The kit will arrive in a package similar to this.
- 2 The kit will include three numbered and pre-labeled boxes.



Each kit contains one of each of the following items:

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



### IMPORTANT:

For every shipment – serial number on inner liner & serial number on cardboard container **MUST MATCH**.

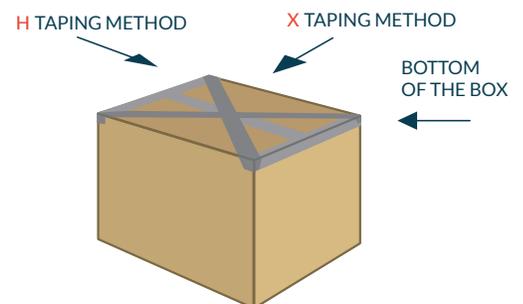
**NOTE:** All direct contact with the LifeInCheck Consumer Drug Take-Back Container should be performed by two pharmacy personnel.

# KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

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

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM						INMAR intelligence	LIFE IN CHECK
Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #		Serialization Tracking Sheet should be validated by 2 pharmacy employees.	
Size of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #			
SERIAL NUMBER	Date Liner Acquired (Signature)	Date Liner Installed (Pharm & Signature)	Date Removed (Pharm & Signature)	Date Transferred to Storage (Pharm & Signature)	Date Shipped (Pharm & Signature)		
Ex: 32567	4/26/19 John Jones Sally Smith	4/26/19 John Jones Sally Smith Sally Smith	5/26/19 John Jones Sally Smith Sally Smith	5/26/19 John Jones Sally Smith Sally Smith	5/23/19 John Jones Sally Smith Sally Smith		

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



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**3** Place inner liner into the box and fold excess material at top over box flaps.



# KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

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



- 5** Place absorbent pad into the installed inner liner.



- 6** Install the lined box (now the "Container") into the Collection Kiosk.



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# KIT INSTRUCTIONS— INSTALLING A NEW COLLECTION CONTAINER

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

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM					
Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #:	
Size of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #:	
SERIAL NUMBER	Date Liner Acquired (Pharmacy)	Date Liner Installed (Pharmacy & Signatures)	Date Removed (Pharmacy & Signatures)	Date Transferred to Storage (Pharmacy & Signatures)	Date Shipped (Pharmacy & Signatures)
Ex: 32587	4/26/19 <i>John Jones</i>	4/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/27/19 <i>John Jones</i> <i>Sally Smith</i>

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



**9** Store remaining spare kits securely for future use.



**10** Use the Drug Disposal Serialization Tracking Sheet to document all inner liner events.

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM					
Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #:	
Size of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #:	
SERIAL NUMBER	Date Liner Acquired (Pharmacy)	Date Liner Installed (Pharmacy & Signatures)	Date Removed (Pharmacy & Signatures)	Date Transferred to Storage (Pharmacy & Signatures)	Date Shipped (Pharmacy & Signatures)
Ex: 32587	4/26/19 <i>John Jones</i>	4/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/27/19 <i>John Jones</i> <i>Sally Smith</i>

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**NOTE:** All direct contact with the LifeInCheck Consumer Drug Take-Back Container should be performed by two pharmacy personnel.

## KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

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

- 1 Unlock and open bottom door.



- 2 Remove full Container from Collection Kiosk **DO NOT** sort, count or inventory pharmaceuticals or touch contents of inner liner prior to sealing.



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# KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

- 3** Immediately seal the Inner Liner by gathering the top of the Liner.
- 4** Bend the gathered portion at the halfway point and fold the top half alongside the bottom half.
- 5** Repeat Step 4 - Again bend the gathered portion at the halfway point and fold the top half alongside the bottom half.

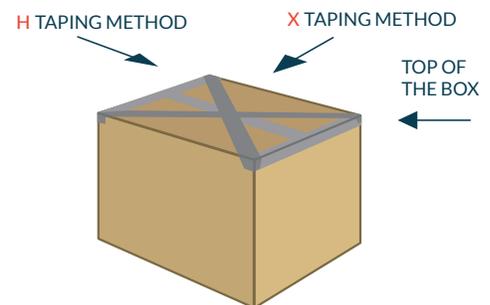


# KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

**6** Cinch and fully tighten the provided zip tie around both halves of the gathered portion of the liner to secure the top.



**7** Close and tape the box top. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams. We recommend 1 strip of tape across the top seam, 2 strips of tape over the edge seams, and 2 strips of tape across the top of the Container placed diagonally. See illustration to right.



# KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

**8** Document removal of Container on the Drug Disposal Serialization Tracking Sheet.

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM					
Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #	
Site of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #	
SERIAL NUMBER	Date Liner Acquired (Signature)	Date Liner Installed (Name & Signature)	Date Removed (Name & Signature)	Date Transferred to Storage (Name & Signature)	Date Shipped (Name & Signature)
Ex: 32587	4/26/19 <i>John Jones</i>	4/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/27/19 <i>John Jones</i> <i>Sally Smith</i>

**9** Store the sealed Container in a secure location until shipped. The Container is pre-labeled for shipping. Document the shipping of the Container on the Drug Disposal Serialization Tracking Sheet.

DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM					
Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #	
Site of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #	
SERIAL NUMBER	Date Liner Acquired (Signature)	Date Liner Installed (Name & Signature)	Date Removed (Name & Signature)	Date Transferred to Storage (Name & Signature)	Date Shipped (Name & Signature)
Ex: 32587	4/26/19 <i>John Jones</i>	4/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/26/19 <i>John Jones</i> <i>Sally Smith</i>	5/27/19 <i>John Jones</i> <i>Sally Smith</i>



## PLEASE NOTE:

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

Additional charges may apply for non-compliance.

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Questions: Contact Consumer Drug Take-Back Client Service Team

[take-back@inmar.com](mailto:take-back@inmar.com)

1-800-350-0396 Option 6, Mon-Fri 8am-5pm EST

# GETTING STARTED

## RECEPTACLE

You will receive your Consumer Drug Take-Back receptacle and your supplies in separate shipments. After unpacking the Consumer Drug Take-Back receptacle, it must be installed according to the “Responsible Disposal Act” Rule which means it must be connected to a wall or the floor ensuring the receptacle is secure. Your receptacle will come pre-drilled in the bottom to make installation easier. Please see the installation instructions included in this email.

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

## SUPPLIES

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

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

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

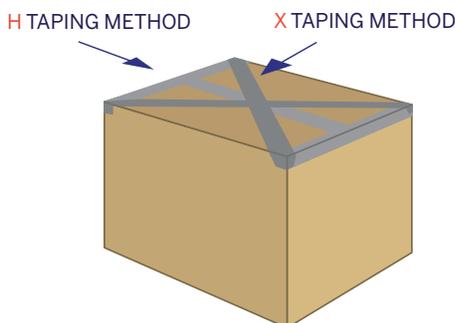
### Each kit contains one of each of the following:

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

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

## CONSTRUCTING YOUR INNER CONTAINER

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



**NOTE:** All direct contact with the unsealed Consumer Drug Take-Back liner must be performed by two pharmacy personnel.

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## PREPARING YOUR CONTAINER FOR USAGE

1. Place Serialized Inner Liner into the box and fold excess material at top over box flaps. Leave Black Zip Tie taped to the Liner for later use. (When inserting Inner Liner, check to ensure Serial Number on Serialized Inner Liner matches Serial Number on the shipping container.)
2. Place absorbent pad into the installed Liner.
3. Install the lined box (now the "Container") into the Collection Receptacle.
4. Immediately document installation of Container (column 3 of the Serialization Tracking Sheet).
5. Store remaining spare kits securely for future use.
6. Lock bottom door and unlock top door to begin CDTB collection.

**NOTE:** All direct contact with the unsealed Consumer Drug Take-Back liner must be performed by two pharmacy personnel.

## PREPARING YOUR CONTAINER FOR SHIPPING

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

1. Unlock and open bottom door.
2. Remove full Container from Collection Receptacle. DO NOT sort, count or inventory pharmaceuticals or touch contents of Liner prior to sealing.
3. Immediately seal the Serialized Inner Liner by gathering the top of the Liner, bending the gathered portion at the halfway point and folding the top half alongside the bottom half. For extra security, bend the gathered portion at the halfway point a 2nd time. While folding Liner, keep Serial Number on Liner visible. Securely cinch the provided Black Zip Tie around both halves of the gathered portion of the Liner to secure the top. Ensure that the zip tie is completely above the exposed end of the top half of the gathered portion and that the zip tie is fully tightened. This will provide an airtight seal at the open end of the Liner to prevent leakage of any trace liquids that may be inside.
4. Close and tape the box top. Seal the middle seam and both outside seams. Leave no untaped spaces along the seams and no less than 3 inches of tape overhang on each side. We recommend 2 strips of tape across the top seam and 2 strips of tape over the edge seams and 2 strips of tape across the top of the container placed diagonally. See illustration of taping method above.
5. Document removal of Container (in column 4 of Serialization Tracking Sheet).
6. Store the sealed Container in a secure location until shipped.

## SHIPPING AND RECORD KEEPING

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

1. Ship in accordance with the DOT Special Permit. Container comes pre-paid and pre-labeled for shipping.
2. When the Liner is shipped, complete column 5 on the Serialization Tracking Sheet. The completed Serialization Tracking Sheet is a record of Liner Events and should be filed in accordance with DEA guidelines.
3. Maintain a copy of the completed Serialization Tracking Sheet in your files for at least 2 years (at the collector's registered location). Refer to 21 CFR § 1304.04(a).
4. Inmar will maintain your modified Form 41 noting destruction date and time on file and will provide it to you upon request.

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## QUICK STEPS

### TO START

- 01** Install the Consumer Drug Take-Back Receptacle per DEA guidelines.

---

- 02** Properly tape container at bottom.

---

- 03** Place Serialized Inner Liner inside with top folded over container flaps.  
*(When inserting Serialized Inner Liner, check to ensure Serial Number on Inner Liner matches Serial Number on the shipping container.)*

---

- 04** Place absorbent pad in bottom of Serialized Inner Liner.

---

- 05** Document the installation of the container on the Serialization Tracking Sheet.

---

- 06** Install container inside Consumer Drug Take-Back receptacle.

---

- 07** Lock bottom door and unlock top door to begin drug take-back collection.

### TO CLOSE

- 01** Open bottom door.

---

- 02** Remove full container, total weight of container **may not exceed 66lbs in weight.**

---

- 03** Ensure the Serial Number is visible before using a zip tie to secure Serialized Inner Liner bag top.

---

- 04** Document the removal of the container on the Serialization Tracking Sheet.

---

- 05** Properly tape container at top.

---

- 06** Container is pre-labeled for return shipment.

**NOTE:** All direct contact with the unsealed Consumer Drug Take-Back liner must be performed by two pharmacy personnel.

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# DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM



Serialization Tracking Sheet should be validated by 2 pharmacy employees.

Name of Collecting Pharmacy		Address of Collecting Pharmacy		Collecting Pharmacy DEA #:	
Size of Liner		Address of Reverse Distributor/Disposal Site		Reverse Distributor/Disposal Site DEA #	

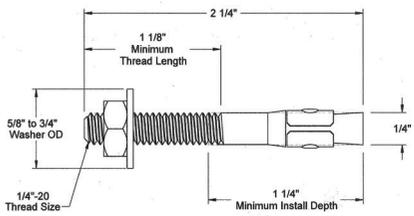
1 SERIAL NUMBER	2 Date Liner Acquired (1 Signature)	3 Date Liner Installed (2 Names & Signatures)		4 Date Removed (2 Names & Signatures)		5 Date Transferred to Storage (2 Names & Signatures)		6 Date Shipped (2 Names & Signatures)	
Ex: 32587	4/26/19	4/26/19		5/26/19		5/26/19		5/27/19	
	<i>John Jones</i>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

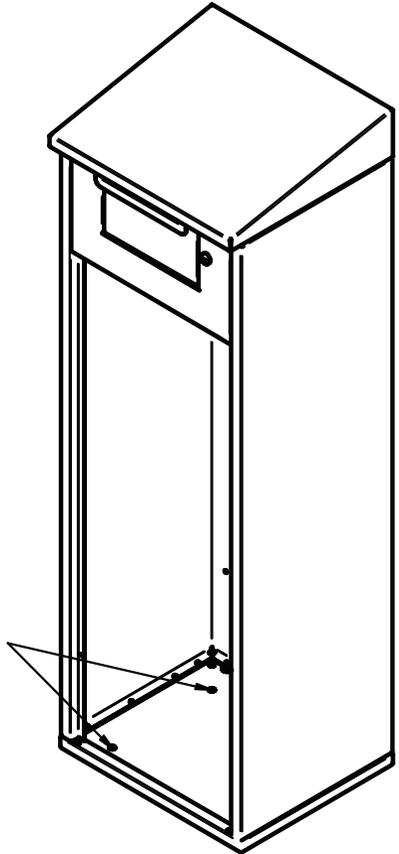
© Inmar 2020 Inmar authorizes the posting of the plan dated May 23, 2020 in accordance with the California Public Records Act, as well as Section B11-543 of the County of Santa Clara Ordinance Code for the purposes of making it available to the public for review and comment. Any other use requires express written consent of Inmar


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

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

# INSTALLATION INSTRUCTIONS

 <p style="text-align: center;"><b>ANCHOR FOR CONCRETE FLOOR</b></p>	 <p style="text-align: center;"><b>SCREW FOR WOOD FLOOR</b></p>	<p>McMaster-Carr - Flanged Hex Head Screws for Wood, Hot-Dipped Galvanized Steel, 1/4" - Page 1 of 2</p> <p><b>McMASTER-CARR.</b></p> <p>Flanged Hex Head Screws for Wood Hot-Dipped Galvanized Steel, 1/4" Size, 2" Long</p> <p>In stock \$10.09 per pack of 50 95524150</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td>Material</td><td>Hot Dipped Galvanized Steel</td></tr> <tr><td>Screw Size</td><td>1/4"</td></tr> <tr><td>Screw Size Decimal Equivalent</td><td>0.2500"</td></tr> <tr><td>Length</td><td>2"</td></tr> <tr><td>Head</td><td>0.375"</td></tr> <tr><td>Width</td><td>0.375"</td></tr> <tr><td>Height</td><td>0.30"</td></tr> <tr><td>Flange Diameter</td><td>0.50"</td></tr> <tr><td>Flange Style</td><td>External Hex</td></tr> <tr><td>Approximate Threads per Inch</td><td>20</td></tr> <tr><td>Thread Direction</td><td>Right Hand</td></tr> <tr><td>Threading</td><td>Partially Threaded</td></tr> <tr><td>Minimum Thread Length</td><td>1"</td></tr> <tr><td>Tapping Method</td><td>Thread Forming</td></tr> <tr><td>Head Type</td><td>Hex</td></tr> <tr><td>Hex Head Profile</td><td>Standard</td></tr> <tr><td>Tip Type</td><td>Pointed</td></tr> <tr><td>Shank Cross Section</td><td>Round</td></tr> <tr><td>System of Measurement</td><td>Inch</td></tr> <tr><td>Screw Features</td><td>Flanged</td></tr> <tr><td>For Use In</td><td>Wood</td></tr> <tr><td>Specifications Met</td><td>ASTM A193</td></tr> <tr><td>RoHS</td><td>Compliant</td></tr> </table> <p style="font-size: small;">These steel screws are hot-dipped galvanized to resist corrosion in wet environments and are a good choice for ACO-treated (pressure-treated) lumber. The flange reduces the risk of cracking material and the hex head provides a secure grip with a wrench. They press threads into material for a tight, secure hold. To prevent splitting, drill a pilot hole slightly smaller than the screw. Head height includes the flange. Length is measured from under the head.</p> <p style="text-align: right; font-size: x-small;">7/17/2012</p>	Material	Hot Dipped Galvanized Steel	Screw Size	1/4"	Screw Size Decimal Equivalent	0.2500"	Length	2"	Head	0.375"	Width	0.375"	Height	0.30"	Flange Diameter	0.50"	Flange Style	External Hex	Approximate Threads per Inch	20	Thread Direction	Right Hand	Threading	Partially Threaded	Minimum Thread Length	1"	Tapping Method	Thread Forming	Head Type	Hex	Hex Head Profile	Standard	Tip Type	Pointed	Shank Cross Section	Round	System of Measurement	Inch	Screw Features	Flanged	For Use In	Wood	Specifications Met	ASTM A193	RoHS	Compliant	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th>DATE</th> <th>SYM</th> <th>REVISIONS RECORD</th> <th>AUTH</th> <th>DR</th> <th>CK</th> </tr> <tr> <td>07/18/2017</td> <td>A</td> <td>RELEASED FOR PRODUCTION</td> <td>WM</td> <td>KQ</td> <td></td> </tr> </table>	DATE	SYM	REVISIONS RECORD	AUTH	DR	CK	07/18/2017	A	RELEASED FOR PRODUCTION	WM	KQ	
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**FIGURE 1**

**INSTALLATION**

**STEP 1: PLACE CABINET IN PERMANENT LOCATION**

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

**STEP 3: DRILL HOLES FOR FLOOR SUBSTRATE**

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

## Appendix D: Promotion Material

### 1. Sample Education Materials

# NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

## SATURDAY, OCTOBER 26, 2019

POWERED BY  LIFEINCHECK™  
CONSUMER DRUG TAKE-BACK

### NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY

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

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

**But if a program is not available:**

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

FOR MORE INFORMATION ON  
PRESCRIPTION DRUG ABUSE, GO TO:

[www.dea.gov](http://www.dea.gov)  
[www.getsmartaboutdrugs.com](http://www.getsmartaboutdrugs.com)  
[www.justthinktwice.com](http://www.justthinktwice.com)

 LIFEINCHECK™  
CONSUMER DRUG TAKE-BACK



**EVERY DAY IS CONSUMER DRUG TAKE-BACK DAY**

Working together to protect our families, communities and environment.

**GO TO [RXDISPOSAL.LIFEINCHECK.COM](https://rxdisposal.lifeincheck.com) TO FIND A RECEPTACLE NEAR YOU**



**HOW IT WORKS**

- 1** Pull to open drawer  
Hale para abrir el cajón
- 2** Place medications inside  
Coloque las medicinas adentro
- 3** Close the drawer  
Cierre el cajón



**LIFEINCHECK**

**SAFELY DISPOSE OF YOUR UNUSED OR EXPIRED MEDICATIONS!**

**DID YOU KNOW?**

**192 AMERICANS**

die every day from a drug overdose.  
\*cdc.gov

**46 MILLION**

people at minimum, in 24 major American metropolitan areas are exposed to pharmaceutical contaminated drinking water.

**83% OF PEOPLE**

who misuse prescription pain relievers including opioids get them from a friend, relative or others.  
\*samhsa.gov

## 2. Sample Authorized Collector Marketing Support

**EVERY DAY IS  
CONSUMER DRUG  
TAKE-BACK DAY**

**STOP BY TO SAFELY  
DISPOSE OF YOUR  
UNUSED OR EXPIRED MEDS**

**83% OF PEOPLE WHO MISUSE PRESCRIPTION  
PAIN RELIEVERS INCLUDING OPIOIDS GET THEM  
FROM A FRIEND, RELATIVE OR OTHERS.**  
(WWW.SAMHSA.GOV)

**46 MILLION AMERICANS ARE EXPOSED TO  
TRACE AMOUNTS OF MEDICATIONS IN THEIR  
DRINKING WATER.**  
(ASSOCIATED PRESS)

**SAFELY DISPOSE OF YOUR UNUSED  
OR EXPIRED MEDICATIONS HERE**

For more information on safe drug storage and disposal, as well as information on additional collection options, visit [rxdisposal.lifeincheck.com](http://rxdisposal.lifeincheck.com) or call **1-800-123-4567**

SPONSORED BY **LIFEINCHECK**

### SOCIAL MEDIA

#### Twitter: Crafting the Perfect Tweet

Twitter is a simple way to quickly share short pieces of information. Twitter posts can be up to 140 characters in length, but 100 characters is the ideal length for maximum distribution. Including images in your tweets will make them stand out in the Twitter feed; these images should be 1084 x 512 pixels\*.

#### Facebook: Appealing to Your Audience

Facebook allows you to share lengthier posts with slightly larger images. However, longer isn't always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 100 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 628 pixels.

#### SAMPLE POSTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*Help us stop the opioid epidemic. Dispose of your unused meds at OUR LOCATION.*

**DID YOU KNOW?**  
**192 AMERICANS**  
die every day from a drug overdose.\*

---

**AT**  
**EVERYDAY IS CONSUMER DRUG TAKE-BACK DAY**

Go to [rxdisposal.Lifeincheck.com](http://rxdisposal.Lifeincheck.com)  
to find a receptacle near you

\*cdc.gov

**LIFE IN CHECK™**

**SAFELY DISPOSE OF YOUR UNUSED OR EXPIRED MEDICATIONS!**

**WE ARE PARTICIPATING!**

**NATIONAL PRESCRIPTION DRUG TAKE-BACK DAY**

**SATURDAY, OCTOBER 26, 2019**

SPONSORED BY **LIFE IN CHECK™**  
CONSUMER DRUG TAKE-BACK

**SAMPLE PRESS-RELEASE**

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

**FOR IMMEDIATE RELEASE**

**CONTACT:**  
 [Insert contact name here]  
 [Insert contact's title here]  
 [Phone number]  
 [contact or program email address]  
[Web site url if you have a web site](#)

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

**[CITY, STATE, TODAY'S DATE] -- [PHARMACY NAME]** announced today it has established a convenient medication takeback program for easy disposal of leftover, unused and out-of-date prescription and over-the counter medications.

**[CITY, STATE]** help reduce the risk of drugs in the home that can potentially harm children, teens or adults. **[PHARMACY NAME]** has set up a secure, safe drop-off location in its pharmacy at **[ADDRESS]** in **[CITY NAME]**.

Unused medications in the home are a source of drug abuse in millions of homes, with the opioid crisis in the United States fueled in part by that availability. More than 83 percent of opioid prescription medications taken by new users are obtained from a friend, relative or others. Overall, 192 Americans die every day from a drug overdose.

"We want to provide the folks in our community with the safe, secure opportunity to clean out their medicine cabinets and make their homes and communities safer," said **[NAME OF PHARMACY MANAGER OR OWNER]**, of **[PHARMACY NAME]**. "We want to remind people that they should not flush drugs down the toilet. Traces of drugs can appear in community drinking water. Our drug disposal unit, which is easily accessible in the pharmacy, is a great answer to that problem and it's simple to do. All they do is just come in, look for the big green receptacle and take it from there. Drugs can be dropped off with no questions asked."

**[PHARMACY MANAGER/OWNER'S LAST NAME]** said there are some things that can't be taken in the receptacle, such as inhalers and needles, but pharmacy staff will be on hand to help determine what to do. The collection receptacle will be available in the pharmacy at **[ADDRESS]**, **[DAYS AND HOURS]**.

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

### 3. Website Interface and Functionality



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

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

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

LOCATIONS

Location:  Distance:  FIND!

YOUR SEARCH RESULTS:

📍 Southside Discount Pharmacy  
3085 Waughtown Street  
Winston-Salem, NC 27107  
[Get Directions](#)

📍 Walkertown Family Pharmacy  
2905 DARROW RD  
WALKERTOWN, NC 27051  
[Get Directions](#)

SHOW ALL RESULTS

**✓ ACCEPTED (ACEPTADOS)**

- Unused or expired prescription medication (Including Schedule II-V controlled substances)  
*Medicamentos con receta no consumidos o vencidos (incluidas las sustancias controladas de clasificación II a V)*
- Unused or expired over-the-counter medication  
*Medicamentos de venta libre, no consumidos o vencidos*
- Pet Medication  
*Medicamentos para mascotas*

**✗ NOT ACCEPTED (NO ACEPTADOS)**

- Schedule I controlled substances  
*Sustancias controladas de clasificación I*
  - Illegal Drugs  
*Drogas ilegales*
- |   |  |   |
|---|--|---|
|  Thermometers<br><i>Termómetros</i>      |  Inhalers<br><i>Inhaladores</i> |  Lotions/Liquids<br><i>Lociones o líquidos</i> |
|  Aerosol Cans<br><i>Latas de aerosol</i> |  Needles<br><i>Agujas</i>       |  Hydrogen Peroxide<br><i>Agua oxigenada</i>    |

**IN THE NEWS**

May 29, 2018  
Inmar Launches LifeInCheck Prescription Drug Plan

October 23, 2018  
Inmar Enhances Features To Its LifeInCheck Drug Disposal Program to Help Combat The Opioid Epidemic

October 26, 2018  
Blue Cross NC, Inmar and Mutual Drug Provide 85 New Drop-Off Boxes for Safe Medication Disposal on National Take Back Day

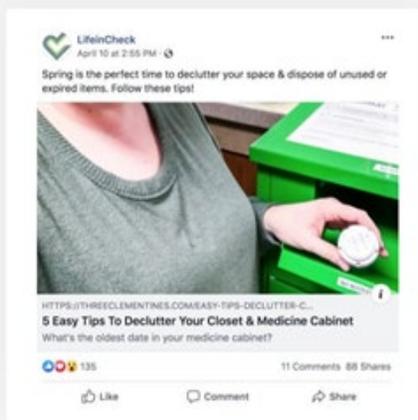


ARE YOU A **PHARMACY OR RETAILER** AND YOU WOULD LIKE TO LEARN MORE ABOUT THE LIFEINCHECK CONSUMER DRUG TAKE-BACK PROGRAM?

**CONTACT US** 



## 4. Sample Social Influencer Content



\*Geo-targeted ads to store list zip codes and interest targeted ads to key terms such as caregiver, home care, nursing, nursing home care, pharmacy, substance abuse prevention, rehabilitation hospitals, environmentalism, social responsibility, environmental protection, and social movements



## Appendix E: Applicable Permits and Licenses

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID	<p align="center"><b>CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE</b>                  UNITED STATES DEPARTMENT OF JUSTICE                  DRUG ENFORCEMENT ADMINISTRATION                  WASHINGTON D.C. 20537</p> <p>Sections 304 and 1008 (21 USC 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.</p> <p><b>THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.</b></p>
R90571364	04-30-2021	\$1523	
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE	
1,2,2N, 3,3N,4,5	REVERSE DISTRIB-COLLECTOR	01-31-2020	
123 COMPLIANT LOGISTICS, LLC 2626 N 29TH AVE PHOENIX, AZ 850091602			



U.S. Department  
of Transportation

East Building, PHH-30  
1200 New Jersey Avenue S.E.  
Washington, D.C. 20590

**Pipeline and Hazardous  
Materials Safety Administration**

SPECIAL PERMIT AUTHORIZATION

DOT-SP 20255

**EXPIRATION DATE: 2021-07-31**

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

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

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

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

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

for William Schoonover  
Associate Administrator for Hazardous Materials Safety

Tracking Number: 2019085496      DUNS Number on file: 613608574

# Enforcement Action Summary Report

*Facility*                      *Aragonite*

<i>Date Received</i>	<i>Agency</i>	<i>Enforcement Type</i>	<i>Alleged Violation</i>	<i>Proposed Penalty</i>	<i>Status</i>	<i>Resolution Date</i>	<i>Penalty Paid</i>
10/20/2016	UDEQ	Notice of Violation	1) Storage facility for water supply had a leak at the time of inspection, 2) the public water supply storage vessel showed signs of a leak.	\$0.00	Resolved w/o Penalty	12/14/2016	\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>			Repaired the tanks.	
2/8/2017	UDEQ - DDW	Notice of Violation	Failure to monitor and report for pesticides and volatile organic compounds in 2016.	\$0.00	Resolved w/o Penalty	2/15/2017	\$0.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>			Updated testing was conducted.	
5/16/2018	UDEQ - Division of Air Quality	Notice of Violation	Failure to submit stack test results, deviation reports, leak detection and repair reports, Benzene NESHAP reports, semi-annual reports and compliance certifications in a timely manner.	\$23,750.00	Resolved	5/21/2018	\$23,750.00
		<i>EA Number:</i>	<i>Description of Resolution:</i>				

1/28/2019	US DEA	Notice of Violation	1) Failure to file annual inventory, 2) delinquent filing of quarterly ARCOS reports, failure to maintain a separate file for Schedule 1 and 2 and Schedule 3 through five controlled substances, 4) failure to record time of annual inventory.	\$120,000.00	Resolved	5/8/2019	\$96,000.00
-----------	--------	---------------------	--	--------------	----------	----------	-------------

*EA Number:*

*Description of Resolution:*

Payment of a civil penalty.



**THANK YOU.**

INMAR.COM

[linkedin.com/company/inmar/](https://www.linkedin.com/company/inmar/)

635 Vine Street,

Winston-Salem, NC 27101