



COMMUNITY DEVELOPMENT AGENCY

ENVIRONMENTAL HEALTH SERVICES DIVISION

Notice of Determination – Product Stewardship Plan Review

County of Marin Safe Drug Disposal Ordinance
(Ordinance No. 3635, County of Marin Code, Chapter 7.90)

Plan Name: Inmar Intelligence, A Product Stewardship Plan for Unwanted Medicine from Households, Marin County, October 18, 2021-Revised November 16, 2021

Plan Operator: Inmar Intelligence
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Manager
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Determination:

The Inmar Intelligence Safe Drug Disposal Stewardship Plan (Plan) for County of Marin dated October 18, 2021, as revised November 16, 2021, is **APPROVED**, subject to the following conditions:

1. Inmar Intelligence shall not implement any changes to the Plan that substantively alter plan operations as per Marin County Code *Section 7.90.070 (B)*, until approved in writing by the Director.
2. Inmar Intelligence shall notify the Director at least 15 calendar days before implementing any changes that do not substantially alter achievement of the service convenience requirement, or other changes that do not substantially alter plan operations as described in Marin County Code *Section 7.90.070 (D)*.
3. Inmar Intelligence may request an advance determination from the Director of whether a proposed change would be deemed to substantively alter plan operations. The Director shall provide a determination within 90 calendar days after receipt of the request and shall provide reasons for the determination per Marin County Code *Section 7.90.070(E)*.
4. Inmar Intelligence shall submit an updated Stewardship Plan to the Director every four years after the Stewardship Plan starts operations per Marin County Code *Section 7.90.060(G)*.
5. Inmar Intelligence shall install the three drop-off sites and 34 mail-back distribution sites secured and detailed in the Plan and shall install an additional five drop-off sites or an additional 10 mail-back distribution sites, consistent with the requirements of Marin County Code *Section 7.90.080* and Inmar's proposal to install two mail-back distribution sites for each drop-off site they are unable to secure.
6. If Inmar Intelligence is unable to secure the additional drop-off sites or mail-back sites in the County within 90 days after Plan approval, Inmar Intelligence shall be required to host at least one Take-Back collection event during the year after Plan approval and every subsequent year

the number of mail-back sites/drop-off sites are not secured. The number of Take-Back events required, and timeline for these events, shall be determined by the Director, in proportion to the number of drop-off sites or mail-back sites that are not secured by Inmar Intelligence within the given time frame. The geographical location of any Take-Back events shall be proposed by Inmar for approval by the Director.

7. Inmar Intelligence shall provide updated information detailing short and long-term goals, and how the Plan will meet the service convenience requirement under Marin County Code *Section 7.90.080(B)(1)* through an updated project plan as described in Section A, page 4 of the revised Inmar Intelligence Plan (Project Plan) within 90 days after Stewardship Plan approval.
8. After the Project Plan is received from Inmar Intelligence, the Director shall determine if the Project Plan, including proposed locations for collection events, meets the requirements of the Marin County Code, including but not limited to adequately addressing underserved areas in the County and meeting the intent of the ordinance to provide reasonably convenient and equitable access for all County residents. If the Director determines that the Project Plan does not sufficiently meet these requirements, Inmar Intelligence shall have the option to submit a revised Project Plan for approval within 30 days of the Director's determination.
9. All confirmed drop-off distribution sites and mail-back distribution sites shall be installed and in active operation within 90 days of Plan approval.
10. Plan shall be available to the public as required under Marin County Code Section 7.90.060(H).
11. The Inmar website must be in operation within 60 days of approval and be available to residents until a single website can be established with all currently approved Plan Operators for all approved and active stewardship plans. Inmar must also provide a toll-free phone number within 60 days of approval and available to residents until a single toll-free number is established with all currently approved Plan Operators for all approved and active stewardship plans
12. Outreach materials shall be provided first in English and Spanish and additional languages as needed and specified by the Director. The toll-free phone number shall also be provided first in Spanish and English and additional languages as needed and specified by the Director.
13. Inmar Intelligence shall submit a monthly Plan implementation status report upon approval of the Plan for the following:
 - Installation/operation of confirmed drop-off distribution sites and mail back distribution sites and timeline status.
 - Updates on acquiring additional drop-off distribution site or mail-back location sites.
 - Coordination with Med-Project, the current Stewardship Plan Operator in County of Marin to establish a single system of promotion (website and phone number), kiosk signage and promotional/outreach materials.
 - The Inmar Intelligence website, *safemedicinedrop.com* functionality updates for the County of Marin including mail back envelope requests, educational materials uploaded, collector kiosk maintenance resources and requests, and drop-off site and mail-back envelope distribution site list updated.
 - Project Plan and timeline for serving the underserved communities in the County of Marin.

Within six months after the end of the first 12-month period of the Stewardship Plan Operation, and annually thereafter, the Plan Operator of a Stewardship Plan shall submit a report to the Director on behalf of participating Producers describing the Plan's activities during the previous reporting period per Marin County Code *Section 7.90.110*.

Signed 

Date 12/22/2021

Greg Pirie, R.E.H.S.
Deputy Director
Marin County Environmental Health Services

