



COMMUNITY DEVELOPMENT AGENCY

ENVIRONMENTAL HEALTH SERVICES DIVISION

## **Notice of Determination – Product Stewardship Plan Review**

### **Marin County Safe Drug Disposal Ordinance**

### **Ordinance #3635**

**PLAN NAME:** Marin County MED-Project, A Product Stewardship Plan for Unwanted Medicine from Households, submitted December 7, 2018.

**PLAN OPERATOR:** Marin County MED-Project, LLC  
Victoria Travis, National Program Director  
1800 M Street NW, Suite 400 S  
Washington, DC 20036  
marincounty@med-project.com

**DETERMINATION:**

The Substantive Change Request identified below to the Marin County MED-Project Stewardship Plan dated December 7, 2018, are Approved.

Marin County Environmental Health Services was notified on March 14, 2020 and received your letter and supporting documents regarding a substantive change request to the current Stewardship Plan (the “Plan”, dated December 7, 2018). According to your letter, the changes requested are specific to On-Demand Collection Service Model, and Modification of Vendor, Transporter, and Disposal Facility Information.

The following requested changes to the Plan are approved. All approvals are as described in the Substantive Change Request letter dated March 14, 2020 and described in the Response to Questions letter dated September 16, 2020.

1. On-Demand Service Collection Services Collection Model: Amendment as stated in the March 14, 2020 Substantive Change Request letter, pg. 1-2. Approved change adding On-Demand Collection Service to the Plan, Section V.B.4.
2. Vendors List as stated in Attachment A, Section X.A.
3. Carriers and Transporters as stated in Attachment A, Section X.B.
4. Reverse Distributors and Transfer Facilities as stated in Attachment A, Section X.C.

5. Hazardous Waste Disposal Facilities as stated in Attachment A, Section X.D. The approval is specifically for the hazardous waste facilities listed for disposal and destruction of unwanted medicines:

- Clean Harbors Aragonite, LLC
- Heritage Thermal Services, Ohio
- Ross Incineration Services, Inc.
- Veolia, Port Arthur

Regarding Non-Hazardous Waste Disposal Facilities (municipal waste combustors and medical waste incinerators) as stated in Attachment A, Section X.D. The Director is still reviewing the adequacy and information prior to approving the facilities for final disposal of unwanted medicines.

The following are revised conditions of approval for Marin County MED-Project Stewardship Plan conditions dated September 27, 2018:

1. Prior to implementing the On-Demand Collection Service Model, MED-Project shall submit to the Department an outline of the training to be provided to kiosk hosts using the new Service model.
2. A Kiosk host who desires to utilize the On-Demand Collection Service Model shall provide written confirmation to the Department that their staff have received re-training in the procedures established for the On-Demand Collection Service Model, and identify the specific Federal Department of Transportation Special Permit they will be party to while utilizing the On-Demand Collection Service Model. Such written confirmation to the Department shall be provided at least 15 days before a change to the On-Demand Collection Service Model.
3. Within 10 business days of the end of each calendar quarter, the producers represented by the MED-Project shall report in writing to the Department the number of kiosk hosts who utilized the On-Demand Collection Service Model in the preceding quarter.

The above Changes and Conditions of Approval shall be incorporated in the MED-Project Stewardship Plan per this Revised Notice of Determination.

Signed: \_\_\_\_\_

Rebecca Ng, Director  
Marin County Environmental Health Services

Date: \_\_\_\_\_

10/29/20