I. Introduction

Inmar submits this Stewardship Plan ("Plan") for unwanted covered drugs in compliance with the Santa Barbara County Code Chapter 18C, Article II, Section 18C-12 through 18C-30, (the "Ordinance"). All capitalized terms not otherwise defined shall have the same meaning as in the Ordinance.

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

II. Contact Information

Ordinance 4971 Section 18C-15(A)

1. Inmar Plan Liaisons

   Inmar Intelligence
   Nick Massaro
   Manager
   Consumer Drug Take Back Solutions
   635 Vine Street
   Winston Salem, NC 27101
   Email: nicholas.massaro@inmar.com
   Phone: 336-770-1992

2. Producer(s)

   Unichem Pharmaceuticals, USA
   Sanjeev Parab
   Director, Finance
   1 Tower Center Boulevard, Suite 2200
   East Brunswick, NJ 08816
   Email: sparab@unichemusa.com
   Phone: 732-253-5954
III. Collection of Unwanted Covered Drugs

✓ Ordinance 4971 Section 18C-15(B)

A. CONVENIENCE

✓ Ordinance 4971 Section 18C-16(B)(1)
✓ Ordinance 4971 Section 18C-16(B)(3)

Inmar will set up a collection system that provides convenient and equitable access to county residents as outlined in the Ordinance 4971 Section 18C-16(B)(1). Drop-off sites are searchable to county residents in Google Maps, simply by typing "Drug Disposal," or other similar phrases in the Google Maps applications.

Pursuant to Ordinance 4971 Section 18C-16(B)(1), Inmar will seek to establish a minimum of 5 drop-off sites per County of Santa Barbara Supervisorial District. Drop-off sites will be geographically distributed to provide reasonably convenient and equitable access. In accordance with ordinance 4971 Section 18C-16(B)(3), Inmar will give preference to retail pharmacy and law enforcement agency locations and help to ensure they are able to meet the requirements of the Ordinance within three months.

Appendix A includes a list of locations that would utilize a collection kiosk as the collection method upon becoming a collector. It is not our intention to duplicate kiosks that already exist in the County currently operated by other Plan Operators. Should volume demands indicate a need for additional kiosk capacity at location covered by Inmar or another Plan Operator, Inmar is willing to place additional kiosks adjacent to existing operating kiosks or supplement kiosk servicing frequency should the Department deem necessary. Inmar will work with other Plan Operators to coordinate kiosk locations and servicing needs to ensure safe and compliant kiosk operation.

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

Inmar will review any potential Authorized Collector site against the California Board of Pharmacy License directory to validate the location holds an active retail, hospital or clinic license. Additionally sites will be required to provide evidence of current DEA registration. Inmar will notify the Director as new Authorized Collector Drop-off sites become operational. Such notification will include the Authorized Collector’s contact information.

Inmar will validate participating Collectors’ California Board of Pharmacy License status and DEA Authorized Collector Location status on an annual basis.
All eligible validated retail, hospital or clinic pharmacy locations not currently participating in an approved Stewardship Plan have been notified of Inmar’s intent to become an approved Operator.

Inmar has no concerns about our ability to meet the convenience standard provided in Ordinance § 18C-16(B)(1), however, to ensure the best possible access for county residents, Inmar also provides mail-back services and collection events, which are described in more detail below.

B. KIOSK COLLECTION

- Ordinance 4971 Section 18C-15(B)
- Ordinance 4971 Section 18C-16(D)

**Kiosk Specifications and Design**

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

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

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

Top and bottom deadbolt locations are hidden from the outside to prevent break-ins.

Should an Authorized Collector request for the initial installation of the kiosk to be managed by Inmar we will coordinate with the location and our contracted agency to install a kiosk at the location. The kiosk host is requested to remove any physical barriers of the identified kiosk location in advance of the agreed upon installation date and time as well as the location to be identified on the floor with markings such as tape to insure the kiosk is installed in the proper location. Some retail companies prefer to retain the liability within their corporation and prefer to complete the kiosk installations themselves with their own engineering teams. In this scenario, Inmar will outfit the locations with kiosks and the corporate technicians will arrange for all installation.

The Inmar kiosk includes signage in English and Spanish Chinese, Russian and Tagalog. Signage includes communication representing items allowed and prohibited for deposit into the kiosk. The signage will also feature a website and toll-free telephone number (detailed further in Section VII) so
users of the program can ask questions and find more information. Inmar will work with the Department to design any additional signage that meets the needs and requirements of the program. Kiosk signage will be designed for consistency with that of existing approved Plan operators. See Appendix C for examples of existing signage. Inmar’s kiosk is sent to the authorized collector along with enough supplies for 3 returns. Supplies include:

- Preaddressed, pre-paid serialized container
- Serialized inner liners to protect against puncture and provide a liquid barrier
- Easy-to-use zip ties to seal inner liner compliantly
- Absorbent pad for placement in the bottom of the inner liner bag

Figure 1: Kiosk Design Features

Figure 2: Kiosk Inner Liner Features
Pick-Up and Disposal Coordination Options

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

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

Inmar will also train authorized Collectors to service the kiosks on their own to allow for expedited servicing as desired. The steps to service a kiosk are fast, efficient, and DEA-compliant. Inmar will provide authorized Collectors with training materials including step-by-step instructions for tracking, sealing, shipping and replacing collection containers. Training materials are provided in Appendix B. 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 B)
- 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 noted 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.

See attached Steps to Start, FAQs, and Installation Instructions provided in Appendix B.

Technician-Assisted Returns

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

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

Final signature from pharmacy employees of completion of service event.

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

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

- 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 B)

- 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

Regardless of the service model selected, Inmar has a long standing contractual relationship with FedEx and therefore has multiple internal and external contacts. Inmar’s procurement and operations teams have direct relationships with personnel at FedEx corporate office. Should an issue arise with the standard 48 hour service level agreement, these contacts will be leveraged daily for mitigation of further issues as well as any needed general support. Detailed FedEx contact information can be found in Section VI.

Inmar will periodically monitor all Kiosk Liner FedEx shipment tracking numbers from pharmacy locations to the designated reverse distributor as designated in Section VI.

Our training with both the retail pharmacy technicians and Inmar technicians include documentation (further described in Appendix B) which details the steps required to schedule FedEx pickups of the full Kiosk Containers. Inmar conveys this training both in written and oral format.

For locations where Inmar technicians aren’t regularly servicing kiosks, Inmar has established several processes for issues to be mitigated. Aside from visual inspection when locking and unlocking the kiosk for use during pharmacy hours, pharmacy staff are provided with the following resources should they experience issues with the kiosk:

- Email the take-back@inmar.com inbox which is monitored by a large team of full time workers and issues can be quickly triaged and handled.
- Call our toll-free number to advise of an issue with the kiosk and request service.

Direct contact with Inmar field service staff who have visited the location during implementation or existing Inmar customer service contacts who pharmacy staff may already work with at Inmar for assistance

Lastly, Inmar has a team of full time staff members dedicated to the program that will regularly visit kiosk locations to review and audit locations for program compliance.

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.

Pick-Up and Disposal
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 collector to develop a collection program 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, 48 hours is the standard response time.

C. MAIL-BACK SERVICES

✓ Ordinance 4971 Section 18C-15(B)
✓ Ordinance 4971 Section 18C-16(B)(1)
✓ Ordinance 4971 Section 18C-16(B)(4)

As required by Ordinance 4971 Section 18C-16(B)(4) Inmar will provide prepaid and preaddressed mailers, free of charge, to disabled or homebound County residents. Mailers will be provided at drop-off sites and will also be available directly from Inmar via the program website and toll-free telephone number.
Mail-Back Distribution Sites
Mailers will be distributed at approved mail-back distribution sites. Consumers will be able to locate the mail-back distribution sites nearest to them on Inmar’s program website, https://safemedicinedrop.com or by calling Inmar’s program toll-free number 888-371-0717.

In locations where Inmar needs to offer Mail-back services locations to supplement the requirements for the convenience standard, our plan is simple and easily repeated. Unless otherwise requested by Authorized Collector kiosk locations, we will distribute Mail-back services envelopes only at locations that are non-kiosk locations.

Once a location has been accepted as a Mail-back services location, Inmar will send a stack of prepaid, pre-addressed Unwanted Covered Drugs Mail-Back Envelopes to that location as a Mail-Back Starter Kit. Mail-Back Envelopes will accept all Unwanted Covered Drugs, including pills, creams and liquids, and schedule II-V controlled substances. However, inhalers and auto-injectors will require the use of different Mail-Back packages (described below) and will not be included in the Starter Kit. The Starter Kit will include 20 Mail-Back Envelopes sent to each location. Inmar will track the unique identifier for all Mail-Back Envelope sent to each location for fulfillment and logistical purposes. Inmar will add a visual reorder trigger in the box of Envelopes. Once the location gets to the reorder trigger in the box, the visual reorder trigger will instruct the location to email Inmar for another kit. This service model ensures that there is no ‘down time’ at the site for Envelopes. If a location begins to use a larger number of Envelopes, the number of fulfilled Envelopes sent to that location will be increased.

Inmar is committed to providing all pharmacies an option to supply their customers with information regarding Mail-Back service options. Inmar will provide pharmacies 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 program website to locate the nearest kiosk or request a mailer. Additionally, we will reach out to pharmacies filling prescriptions by mail to include the cards for the same options. These cards can also be distributed at non pharmacy retail locations such as pet stores.

Additionally, County Residents will be able to request one Unwanted Covered Drug Envelope at a time via the Plan website or toll-free number. County Residents will receive the Unwanted Covered Drug Envelope no later than 10 business days from date of request.

Both the Unwanted Covered Drugs and Inhaler Envelopes will meet DEA rule requirements under § 1317.70(c):
- Preaddressed, postage paid
- Nondescript, and do not indicate what may be inside
- Waterproof, tamper-evident, tear-resistant, and sealable
- Contain a unique ID number that allows for tracking
- Include instructions for the user that indicate the process for mailing the package, substances that can be sent, notice that packages can only be mailed in the US customs territory, and notice that the only packages provided by the authorized collector will be accepted
- No personally-identifiable information will be required

Both Envelopes are white in color with a gray interior and are 7” x 10”. The Envelopes include a 3” perforated lip security seal. They are distributed by our third party contractor 123 Compliance.
Logistics, Inc.

A sample envelope is shown below

Sample Inhaler Envelope
County Residents will be able to request one Inhaler Envelope at a time via the Plan website or toll-free number. County Residents will receive the Inhaler Envelope no later than 10 business days from date of request.
Sample Auto Injector Container
County Residents will also be able request one auto-injector Mail-back container at a time via the Plan website or toll-free number. County Residents will receive the Inhaler Envelopes no later than 10 business days from date of request. Auto-injector containers will meet all DOT requirements and will be fulfilled by 123 Compliance Logistics, LLC. See below for specifications and sample.

<table>
<thead>
<tr>
<th>Specifications</th>
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<tbody>
<tr>
<td>Access</td>
</tr>
<tr>
<td>Dimensions (in.)</td>
</tr>
<tr>
<td>Color</td>
</tr>
<tr>
<td>Lid Type</td>
</tr>
<tr>
<td>Liquid Absorbing Pad</td>
</tr>
<tr>
<td>Universal Biohaz Sym</td>
</tr>
<tr>
<td>Volume (L)</td>
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</tbody>
</table>
Mail-Back Tracking
All mailers (Unwanted Covered Drugs Envelopes, Inhaler Envelopes and Auto-Injector Containers) will have a unique, serialized identification number. Once the mailer arrives at the destruction facility, the serial number, among other information, will be noted before final disposition. Please see the Disposal Section VI for additional information as to what information is retained for reporting purposes.

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

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

D. COLLECTION EVENTS
✓ Ordinance 4971 Section 18C-15(B)
✓ Ordinance 4971 Section 18C-16(B)(1)

Inmar’s goal is to meet the convenience standard within the County. However, we also recognize that this may not be possible both logistically and physically. Inmar is willing to facilitate collection events, however, the frequency of these events will be dependent upon a number of factors. Below, we describe our approach to planning, hosting, staffing and promoting collection events.
Method for Determining the Need for Collection Events
Our intention is to meet convenience standards by supplementing collection kiosks with mail-back locations in each supervisorial district. Semi-annually, the gaps in coverage and convenience that exist in each district will be evaluated, as well as progress being made against set collection goals to determine the need for Collection Events. As a result of any identified gaps, we will plan and execute a collection event to provide additional support for the underserved population.

Inmar will confirm with the Department any data collected and the resulting location and dates of collection events planned.

Location Planning
Locations of collection events will be determined based on the population centers that are most in need while taking into consideration their access to collection kiosks and mail-back distribution sites. Once the area of need is identified, Inmar will explore locations where it is feasible to host a collection event. Most often this will be at a Law Enforcement Agency or a satellite LEA location nearest the target area. However, Inmar has relationships with many other organizations that may be interested in hosting a collection event. We may determine these locations to be even more convenient for residents if they are places that the population is already visiting on a regular basis or can accommodate unique situations such as drive-through collection during peak flu and virus seasons. Additionally, Inmar will consider the willingness or availability for LEA’s to provide oversight at the selected location. Inmar will ensure any selected locations meet all applicable laws and regulations.

Event Staffing and Oversight
In compliance with DEA 1317(a)-(b), Inmar will ensure that at least one Law Enforcement Agency personnel is present at each collection event. LEA’s will be responsible for maintaining any records of removal, storage, or destruction of the controlled substances collected in a manner that is consistent with that agency's recordkeeping requirements for illicit controlled substances evidence. In addition, any controlled substances collected at collection events will be stored and transferred for destruction in a manner that prevents the diversion of these substances.

Inmar will also provide at least two staff members to be present to assist LEAs with logistics, coordination and/or other needs during the event. It will be Inmar’s responsibility to coordinate with the City and LEAs to ensure compliance with all applicable laws and regulations. The Inmar team will work with the designated LEA to ensure that all material collected is placed in compliant collection kiosks and any material that does not meet legal requirements is rejected.

Execution Procedures
As required by DEA 1317.65, Law enforcement officers employed and authorized by the LEA will maintain control and custody of the collected substances from the time the substances are collected from the ultimate user or person authorized to dispose of the ultimate user decedent's property until secure transfer, storage, or destruction of the controlled substances has occurred.

Inmar recognizes and will ensure that only ultimate users and persons entitled to dispose of an ultimate user decedent's property in lawful possession of a controlled substance in Schedule II-V may transfer these substances to law enforcement during the collection event. No other person will handle the controlled substances at any time.
At the conclusion of collection events, Inmar will work with LEAs to ensure that the collected materials are properly weighed, packaged and shipped to Inmar’s designated destruction partner (see Section VI) in compliance with all applicable laws. As is standard practice for kiosk returns under this plan, inner liners will be tracked via their unique identifiers from shipment location to the designated destruction facility.

Inmar will make certain that LEAs keep a record of the following information after the transfer of controlled substances as a result of any collection events:

- unique identification number of the sealed inner liner transferred
- size of the sealed inner liner transferred (e.g., 35-gallon)
- name, address, and registration number of the reverse distributor to whom the controlled substances were transferred.

**Collection Event Promotion**

Inmar will work with the local law enforcement agency or other designated location on any advertisement, promotion, set-up and tear down of the event and community engagement in person. Inmar will provide all promotion for the collection event, including local advertising, LEA (or other location organization), social media, and press releases to local news outlets.

**Collection Event Fees and Costs**

Inmar will pay all administrative and operational costs associated with collection events as part of this plan.

**E. SAFETY AND SECURITY**

**Ordinance 4971 Section 18C-16(B)(2)**

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

Additional information on how Inmar manages documentation and tracking can be found in Section IV. More detail on patient privacy practices is also provided in Section VI.

**F. DROP-OFF SITES**

**Ordinance 4971 Section 18C-16(C)**  
**Ordinance 4971 Section 18C-16(D)**

In compliance with Ordinance 4971 Section 18C-16(C), Inmar will operate a drop-off site within each county-owned pharmacy or clinic.

Appendix A includes a list of locations that would utilize a drop box as the collection method upon
becoming a collector.

Pursuant to Ordinance 4971 Section 18C-16(D), Inmar will accept unwanted covered drugs from residents during all hours that the retail pharmacy, law enforcement agency, or other collector is normally open for business.

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

G. SUPPORT FOR LAW ENFORCEMENT

Ordinance 4971 Section 18C-16(E)

Inmar will provide support for law enforcement agencies that participate in a collection program for unwanted covered drugs per the requirements of Ordinance 4971 Section 18C-16(E). Inmar will provide law enforcement agencies with the same collection kiosks as described in section III.B above. The kiosks come with the necessary accessories and the kits are auto-replenished in sets of three. Inmar provides the same promotional material and opportunities to law enforcement agencies as would be provided to retail pharmacies or other collectors.

Law enforcement agencies will be able to accept unwanted covered drugs by way of the provided kiosk. Inmar offers optional on-site service for the collection, replacement, and shipping of full containers at no additional cost.

Inmar will initiate standard service intervals for any law enforcement agency that requires it. Once a pattern of usage has been established, the service schedule will be adjusted with the agreement of the agency 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.

The service event will include:

- Observation of the condition of the receptacle upon arrival
- Notification to the agency personnel of arrival
- Coordination of 2 agency personnel to witness change out of receptacle supplies
- Removal, packaging, and documentation of the container from the receptacle
- Replenishment of new supplies for renewed operation
- General clean-up and wipe-down of receptacle
- Notation of container's serial number removed, and serial number installed along with signatures by 2 agency employees (witnesses)
- Removal of full container to be placed securely within the agency to await FedEx pick up
- Final signature from agency personnel of completion of service event.
IV. Handling and Disposal System

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

In accordance with Ordinance 4971 Section 18C-15(C) Inmar subcontracts with a trusted, permitted partner for hazardous waste disposal.

Kiosk containers will be sent using Inmar’s DOT Special Permit #20499, from the authorized Collector via FedEx to Inmar’s third party contract, 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
- FedEx 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.

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Contact Information</th>
<th>Registration Information</th>
<th>Type of Incineration</th>
</tr>
</thead>
<tbody>
<tr>
<td>123 Compliant Logistics, LLC</td>
<td>Rory Buske 602-612-4140</td>
<td>DEA Reverse Distributor-Collector: R90571264</td>
<td>N/A</td>
</tr>
<tr>
<td>2626 N 29th Ave Phoenix, AZ 85009</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Clean Harbors Aragonite</td>
<td>Michael Marlow 435-884-8100</td>
<td>EPA ID: UTD981552177</td>
<td>Hazardous Waste Incinerator Covered Drugs all Mailers</td>
</tr>
<tr>
<td>11600 N. Aptus Rd. Aragonite, UT94029</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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. Copies of all relevant permits can be found in Exhibit E.

V. Policies and Procedures

✓ Ordinance 4971 Section 18C-15(D)

Inmar operates drug take-back boxes across 46 States and the District of Columbia as part of its operations today and maintains compliance with all applicable federal, state, and local rules and laws. Upon approval to act as a “Stewardship Organization,” Inmar will ensure that it acts in compliance 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, vendors, and collectors will specifically be required to comply with the Controlled Substances Act, 21 USC SS 801-971 and 21 CFR SS 1317, United States Department of Transportation Hazardous Materials Safety Regulation, 49 CFR parts 100-185, and all applicable Santa Barbara County Codes and Regulations.

The DEA Rule defines collectors as law enforcement agencies and additionally as retail pharmacies, reverse distributors, hospitals or clinics with onsite pharmacies, and certain other entities that are registered with DEA as a 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 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.

Tracking is well-documented as evidenced by the Inmar serialization tracking form that is included at the end of this section. This form must be completed and witnessed by two authorized pharmacy employees, which assures compliance and safety across the program, and internally by both the stewardship organization and the collector.

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 will require each authorized collector to understand and comply with all Federal, State, and local regulatory requirements pertaining to Unwanted Covered Drugs applicable at the authorized Collection Point.

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

Authorized collectors must maintain a copy of the completed form, a copy of the FedEx tracking information, and other records as applicable, on file at the Collection Point for at least two years. This tracking process will allow Inmar to report the number of collector containers distributed and returned in the annual reporting provided to the Department, as required.
VI. Patient Privacy

Inmar provides significant training to our participating authorized collectors and strictly follows the DEA guidelines for the proper handling of the Plan kiosks and inner liners. This begins with the proper training of the authorized collector in the compliant operation of the kiosks and proper preparation, removal, and packaging of the container. It also involves the training of the Inmar staff that may come into contact with the full container to ensure proper handling. Inmar strictly complies with State and Federal statutes and regulations including, but not limited to, the DEA guidelines cited below.

According to the DEA - As provided in §§ 1317.60(c) and 1317.70(f), inner liners shall be sealed immediately upon removal from the permanent outer container; sealed inner liners and returned mail-back containers shall not be opened, x-rayed, analyzed, or otherwise penetrated. Accordingly, their contents shall not be sorted or inventoried subsequent to being placed into kiosks or mail-back containers. To clarify this, § 1317.75(c) was modified to add the prohibition against individually handling substances after they have been deposited into collection kiosks.

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

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

VII. Public Education Effort and Promotion Strategy

Inmar will execute a comprehensive and measurable public outreach strategy to drive awareness of the stewardship plan and maximize participation as required by Section 18C-17. 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 residents, pharmacists, retail pharmacies, healthcare facilities and providers, veterinarians, and veterinary hospitals.

A leader in the promotions space for nearly 40 years, Inmar has a unique set of core capabilities relative to other prospective program operators, specifically in consumer marketing and activation. Thus, in addition to traditional outreach methods (signage, written materials, etc.), Inmar is able to drive participation among interested parties with modern, high-impact tactics such as influencer
marketing and targeted media.

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:

- Encourage safe storage of drugs in the home (especially around children and teens)
- Dangers of drug misuse (i.e., not taking medicines as prescribed)
- Discourage improper disposal of drugs (e.g., flushing or solid waste collection)
- Arrival of a safe drug take-back solution with instructions for how to locate and participate
- Collection event promotion.

If more than one stewardship plan is approved by the department, Inmar will seek to coordinate its promotional activities with other approved operators within 12 months after the other plan is approved. Inmar’s Plan 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 plans.

B. STANDARDIZED INSTRUCTIONS

☑ Ordinance 4971 Section 18C-17(A)(2)

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

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

Training material samples are provided in Appendix C.

C. DISPLAY MATERIAL

☑ Ordinance 4971 Section 18C-17(A)(3)

The collection kiosks themselves will be readily recognizable. The standard color for the receptacles is bright green for easy identification, and each receptacle is adorned with clear graphical instructions that are legible and easily understood by all county residents, including individuals with limited English proficiency.

The Inmar kiosk will have signage that communicates what is and is not allowed to be placed inside. The signage will also feature a website and toll-free telephone number (detailed further in Section IV) so users of the program can ask questions and find more information. Inmar will work with the Department to design signage that meets the needs and requirements of the program. See Appendix B for examples of signage.
D. WEBSITE AND TOLL-FREE NUMBER

- Ordinance 4971 Section 18C-17(A)(4)

Inmar’s comprehensive and easy-to-use system for public information includes the following:

- Website
- Toll-free number
- Outreach Material
- Social Media Marketing
- Targeted Media.

Each of these methods is described below in more detail.

**Website**
Inmar will provide a mobile-optimized website, appropriately translated into English and Spanish, which will publicize collection options and educate county residents 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 county residents to find the nearest collector site or mail-back distribution site via an interactive map. The list of locations will be updated monthly to ensure accuracy and include all locations in the County regardless of Plan Operator.
- Allow county residents to request prepaid mail-back mailers.

Retailers or pharmacies interested in participating in the drug take-back program will be able to request more information through the website.

**Toll-Free Telephone Number**
Inmar will operate a multi-lingual (English & Spanish) toll-free call center that interested parties can call to learn more about the Plan, take-back events, and best practices for disposal of Unwanted Products. Callers will be validated by zip code for applicable county Plan offerings. County residents will also be able to request information about the nearest Collection Point or mail-back envelope distribution site, or request that a prepaid mailing envelope is sent to them. The call center is operated with live operators and will be staffed with a third party service to assist with live translation in the required languages. All operators are trained to assist 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.

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

These materials will:

- Provide instruction on how to safely store covered drugs at home
• Inform of the risks of disposing of unwanted covered drugs in inappropriate waste streams (e.g., solid waste collection, sewer, or septic systems)
• Outline how to participate in the Plan for safe disposal of unwanted covered drugs.

All materials will be easily understandable by interested parties with varying levels of English, Spanish and any other languages required by the Department and will leverage explanatory graphics to aid in comprehension.

Please see Appendix D for example materials.

Social Influencer Marketing
Each Inmar Intelligence social influencer campaign progresses through four stages: Plan, Discover, Activate, and Measure.

Plan

In the Plan stage, we leverage our in-house social insights toolkit, to create content themes and targeting parameters. The Inmar team pulls data across 36MM social engagements to lend insight into trending topics, ideal campaign timing, and key audience demographics. For example, our social media tool kit may illustrate that conversations around National Consumer Drug Take-Back Day spike three weeks prior to the event in certain regions, among a specific demographic. With this knowledge in hand, Inmar Intelligence works with our influencers to curate and distribute content related to National Consumer Drug Take-Back Day and distribute it to the target audience who live in a specific area in the three weeks leading up to the event.

Discover

The Discovery stage is where influencers are matched to the campaign. Inmar Intelligence has a private, invite-only community of influencers each individually vetted for content quality, historical performance and audience quality.

Activate

Once the influencers have been selected, it is time to start creating and distributing content. Influencers are provided with a brief that outlines the key message, desired outcomes, and any parameters or restrictions. Outside of the brief, influencers are given creative liberty to ensure that the content still feels authentic and will resonate with their followers. Importantly, partners have the ability to approve content to ensure it meets their requirements before it is published.

Upon distribution, influencers organically reach thousands of engaged followers and subscribers on their respective social platforms. Inmar Intelligence’s Media Operations team closely monitors the performance of each individual post and compares it to benchmark data. Particular emphasis is put on metrics such as engagements, clicks, and shares (as opposed to views and impressions) because the former metrics suggest action and deep engagement rather than a passive (or even unconscious) glance at the content.

Measure
For the entirety of the campaign, an online dashboard enables us to continuously monitor campaign performance. All metrics reported within the dashboard are third-party verified. Inmar has a curated network of more than 12,000 highly-vetted influencers who are experts at creating authentic, compelling content that can drive awareness and inspire participation among covered entities. Inmar utilizes sophisticated influencer selection, data-driven content distribution, and audience re-engagement tactics to ensure that content is hyper-relevant and that the covered entities receiving the content are the ones most inclined to take action.

Content can focus on an array of topical themes, however, based on the program requirements, Inmar’s recommendation would be one, or a combination of, the following:
- Tips for safe storage of medications in the home prior to disposal
- Education about the implications of improper drug disposal

Promotion of the product stewardship plan, including directions on where and how to participate.

**Impact Measurement**
In accordance with Ordinance 4971 Section 18C-21, 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 have continuously set the industry standard with their emphasis on transparency and quantifiability over vanity metrics and theoretical explanations.

All paid and organic activity is measured using the industry's most powerful analytics suite to capture true ROI. Reporting will include:
- Third-party verified Content View & Engagement reporting
- Engagement breakdown by social platform, including Time on Content
- Social Content Ad™ (aka social media ad) performance data
- Total Media Value (TMV) calculations
- Thumbnail links to all influencer content, and performance metrics for individual influencer posts (including TMV for each post).

**E. BIENNIAL SURVEY**

Inmar will conduct a biennial survey of County residents as well as pharmacists, veterinarians, and health professionals who interact with patients on use of drugs after the first full year of operation of the Plan. The aim of the survey questions will be to measure the percent awareness of the Plan, assess to what extent drop-off sites and other collection methods are convenient and easy to use, and assess knowledge and attitudes about risks of abuse, poisonings, and overdoses from prescription and nonprescription 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. Results of the survey will be reported to the Director and made available to the public on the website required in Section 18C-17(A)(4) within 90 calendar days of the end of the survey period. The privacy of all survey respondents will be maintained.
F. LANGUAGE TRANSLATION

✓ Ordinance 4971 Section 18C-17(B)

All outreach methods will be translated into or conducted in both English and Spanish, and other languages specified by the Director and agreed by Inmar.

VIII. Short-term and Long-term Goals

✓ Ordinance 4971 Section 18C-15(G)

Collection Goals

<table>
<thead>
<tr>
<th>6 Months</th>
<th>12 Months</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Initiate program operation</td>
<td>Inmar’s goal is a minimum of 25 collection kiosks placed across the County collectively with the existing approved Plan Operator(s) to provide equitable and reasonably convenient access to residents. If this goal cannot be met, underserved areas will be targeted for mail-back distribution sites or collection events.</td>
</tr>
<tr>
<td>• Increase collector drop-off sites in the County</td>
<td>• Establish mail-back distribution sites and/or collection events in areas that are underserved by collection drop-off sites</td>
</tr>
<tr>
<td>• 5 collection kiosks placed across the County.</td>
<td>• Provide and communicate system for pharmacies to request mailers.</td>
</tr>
</tbody>
</table>

Promotion Goals

<table>
<thead>
<tr>
<th>Complete</th>
<th>6 Months</th>
<th>12 Months</th>
<th>18 Months</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Website launch</td>
<td>• Phase 1 website functionality updates:</td>
<td>• Phase 2 website functionality updates:</td>
<td>• Phase 3 website functionality updates:</td>
</tr>
<tr>
<td>• Educational materials</td>
<td>o Mailer requests</td>
<td>o Translation into specified languages</td>
<td>o Collection site and mail-back distribution site list updated (ongoing)</td>
</tr>
<tr>
<td>• Collector marketing support materials</td>
<td>o Educational materials uploaded</td>
<td>o Collection site and mail-back distribution site list updated (ongoing)</td>
<td>• Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ Consumer Drug Take-Back posts per month)</td>
</tr>
<tr>
<td></td>
<td>o Collector kiosk maintenance resources and requests</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>o Collection site and mail-back distribution site list updated (ongoing)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Multi-lingual, toll-free call center launch</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Initiate social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ Consumer Drug Take-Back posts per month)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Continue social influencer and targeted media outreach (1 influencer campaign and 2 promoted LifeInCheck™ Consumer Drug Take-Back posts per month)</td>
<td></td>
</tr>
</tbody>
</table>
IX. Additional Plan Considerations

Existing Providers of Pharmaceutical Waste Services

Inmar Intelligence understands and commits to the requirement that all approved program operators are required to collaborate to share requirements for a single system of program operation. Inmar is willing to work with the existing approved program operator to share program costs in a fair and equitable manner which both program operators can mutually agree upon. Inmar is committed to engaging the incumbent immediately thereafter Plan approval to begin discussions.

Package Separation & Recycling

DEA § 1317.75(c) prohibits handling substances after they have been deposited into a collection kiosk. For this reason, Inmar is unable to separate covered drugs from packaging and recycle drug packaging. However, Inmar can 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 still 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 just the past two years alone. We will continue to look for opportunities to expand our eco-friendly efforts in the County.

Inmar Energy Metrics

Megawatts of Clean Energy Recovered:

2017 = 5,436
2018 = 5,643

Barrels of Oil Saved:

2017 = 9,896
2018 = 10,270

Homes Powered for a Year:

2017 = 482
2018 = 495
X. Administrative and Operational Costs

Ordinance 4971 Section 18C-20

At no point will consumers be charged a point-of-sale fee for any costs of the Stewardship Plan or for the collection of Unwanted Covered Drugs. Inmar shall prepare, implement and operate its Plan as required at its own cost either individually or jointly with Producers including but on limited to the costs and expenses of:

- Collection and transportation supplies, such, as shipping boxes and liners, for each Drop-off Site;
- Acquisition and distribution to Collectors of all Secure Collection Bins for Drop-off Sites;
- Ongoing maintenance or replacement of Secure Collection Bins, as reasonably requested by Collectors;
- Prepaid, preaddressed Mailers upon request;
- Operation of periodic collection events, including costs of law enforcement staff time if necessary;
- Transportation of all collected Unwanted Covered Drugs to final disposal, including costs of law enforcement escort if necessary;
- Disposal of all Unwanted Covered Drugs in accordance with Title 21, Code of Federal Regulations;
- Stewardship Plan promotion and education,
- Any review of a Stewardship Plan by Director;
- Any review and oversight by Director of a Stewardship Plan for the purposes of obtaining compliance.

XI. Reporting

Ordinance 4971 Section 18C-21

Within six months after the end of the first 12-month period of operation, and annually thereafter for a period covering January 1 – December 31, Inmar will submit a report describing the plan’s activities during the previous reporting period. The report will include:

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

Inmar will provide the Department with notification of any changes in plan operator or producers within 30 days of the change.
Appendix

A. Potential Drop-Off Sites 30
B. Collection Kiosk Signage 32
C. Training Material 34
D. Promotion Material 55
E. Applicable Permits and Licenses 62
### Appendix A-1: Confirmed Drop-off Sites

<table>
<thead>
<tr>
<th>Store Name</th>
<th>Store Address</th>
<th>Store City</th>
<th>Store Zip</th>
<th>District</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALBERTSONS LLC</td>
<td>1018 CASITAS PASS RD</td>
<td>CARPINTERIA</td>
<td>93013</td>
<td>1</td>
<td>Confirmed</td>
</tr>
<tr>
<td>ALBERTSONS LLC</td>
<td>1046 COAST VILLAGE RD STEB</td>
<td>MONTECITO</td>
<td>93108</td>
<td>1</td>
<td>Confirmed</td>
</tr>
<tr>
<td>NEW ALBERTSON’S, INC.</td>
<td>1500 N H ST</td>
<td>LOMPOC</td>
<td>93436</td>
<td>4</td>
<td>Confirmed</td>
</tr>
<tr>
<td>ALBERTSONS LLC</td>
<td>1120 E CLARK AVE</td>
<td>ORCUTT</td>
<td>93455</td>
<td>4</td>
<td>Confirmed</td>
</tr>
<tr>
<td>VONS PHARMACY #1738</td>
<td>729 NORTH H STREET</td>
<td>LOMPOC</td>
<td>93436</td>
<td>4</td>
<td>Confirmed</td>
</tr>
<tr>
<td>ALBERTSONS LLC</td>
<td>2320 S BROADWAY</td>
<td>SANTA MARIA</td>
<td>93454</td>
<td>5</td>
<td>Confirmed</td>
</tr>
</tbody>
</table>

Inmar will provide the Director a list of Confirmed Drop-off Sites annually with the annual report, or as requested by the Director.

### Appendix A-2: Potential Drop-off Sites

<table>
<thead>
<tr>
<th>Store Name</th>
<th>Store Address</th>
<th>Store City</th>
<th>Store Zip</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBA COSTCO PHARMACY #474</td>
<td>7095 MARKET PLACE DRIVE</td>
<td>GOLETA</td>
<td>93117</td>
<td>Notified</td>
</tr>
<tr>
<td>DBA CVS/PHARMACY #17751</td>
<td>6865 HOLLISTER AVENUE</td>
<td>GOLETA</td>
<td>93117</td>
<td>Notified</td>
</tr>
<tr>
<td>DBA: WALGREENS #06289</td>
<td>5900 CALLE REAL</td>
<td>GOLETA</td>
<td>93117</td>
<td>Notified</td>
</tr>
<tr>
<td>DBA: CVS/PHARMACY #09871</td>
<td>1317 N H ST</td>
<td>LOMPOC</td>
<td>93436</td>
<td>Notified</td>
</tr>
<tr>
<td>DBA: WALGREENS #06290</td>
<td>937 NORTH H STREET</td>
<td>LOMPOC</td>
<td>93436</td>
<td>Notified</td>
</tr>
<tr>
<td>WAL-MART PHARMACY 101989</td>
<td>701 WEST CENTRAL AVE</td>
<td>LOMPOC</td>
<td>93436</td>
<td>In Discussion</td>
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<tr>
<td>DBA: CVS/PHARMACY #09333</td>
<td>1282 COAST VILLAGE RD</td>
<td>SANTA BARBARA</td>
<td>93108</td>
<td>Notified</td>
</tr>
<tr>
<td>CVS PHARMACY #16105</td>
<td>223 E BETTERAVIA RD</td>
<td>SANTA MARIA</td>
<td>93454</td>
<td>Notified</td>
</tr>
<tr>
<td>DBA COSTCO PHARMACY #1275</td>
<td>1700 S. BRADLEY RD.</td>
<td>SANTA MARIA</td>
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<tr>
<td>DBA: WALGREENS #06287</td>
<td>2399 S BROADWAY</td>
<td>SANTA MARIA</td>
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<td>DBA: WALGREENS # 06288</td>
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<td>SANTA MARIA</td>
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<tr>
<td>------------------------</td>
<td>--------------</td>
<td>-------------</td>
<td>-------</td>
<td>----------</td>
</tr>
<tr>
<td>WAL-MART PHARMACY 105658</td>
<td>2240 S BRADLEY RD</td>
<td>SANTA MARIA</td>
<td>93454</td>
<td>In Discussion</td>
</tr>
<tr>
<td>WAL-MART PHARMACY 105659</td>
<td>500 SOUTH BLOSSER RD</td>
<td>SANTA MARIA</td>
<td>93454</td>
<td>In Discussion</td>
</tr>
<tr>
<td>WAL-MART PHARMACY 102507</td>
<td>2220 SOUTH BRADLEY</td>
<td>SANTA MARIA</td>
<td>93455</td>
<td>In Discussion</td>
</tr>
</tbody>
</table>
Appendix B: Collection Kiosk Signage

![Collection Kiosk Signage](image)

**Life in Check**

**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 1-800-123-4567

---

**Consumer Drug Take-Back**
*(Programa de Eliminación de Medicamentos)*

1. **Pull to open drawer** *(Abre para abrir el cajón)*
2. **Place medications inside** *(Coloque los medicamentos adentro)*
3. **Close the drawer** *(Cierra el cajón)*

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

**Not Accepted (No Aceptados)**
- Schedule I controlled substances *(Sustancias controladas de clasificación I)*
- Illegal drugs *(Drogas ilegales)*
- Mercury-Containing Thermometers *(Termómetros de Mercurio)*
- Needles *(Agujas)*
LIFE IN CHECK™
CONSUMER DRUG TAKE-BACK

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

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

DID YOU KNOW?

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

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

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

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

TOGETHER, WE CAN MAKE A DIFFERENCE!
Tell your friends and relatives about this safe drug disposal location.

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

© Inmar 2020. Inmar authorizes the posting of the plan dated December 1, 2020 in accordance with Section 18C-23 (F) of the Santa Barbara County Code for the purposes of making it available to the public.
Appendix C: Training Material

Training material provided to collectors include:

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

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

CONSUMER DRUG TAKE-BACK
CLIENT SERVICE TEAM

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

INMAR.COM/SOLUTIONS
WHAT TO EXPECT AS A NEW INMAR CONSUMER DRUG TAKE-BACK PROGRAM CLIENT

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

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

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

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

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

FREQUENTLY ASKED QUESTIONS

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

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

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

**Installation / Removal Continued**

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

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

**Compliance / Regulatory**

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

**Compliance / Regulatory Continued**

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

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### Question & Answer

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

### Marketing / Promotion

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

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

**Consumer Drug Take-Back Client Service Team ● Take-Back@inmar.com**

(800) 350-0396 Option 6 ● Mon - Fri 8am-5pm EST
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”).

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.

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).
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.


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.
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.
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
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.

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 box placed diagonally. See illustration to right.

3. Place inner liner into the box and fold excess material at top over box flaps.
4 Tape the zip tie to the inside of the door for later use.

5 Place absorbent pad into the installed inner liner.

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

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

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

9 Store remaining spare kits securely for future use.

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

KIT INSTRUCTIONS— REMOVING AND SEALING A FULL COLLECTION CONTAINER

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

1 Unlock and open bottom door.

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

3  Immediately seal the inner liner by gathering the top of the liner.

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

5  Repeat Step 4 - Again bend the gathered portion at the halfway point and fold the top half alongside the bottom half.
**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 un-taped 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.

PLEASE NOTE:

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

Additional charges may apply for non-compliance.

Questions: Contact Consumer Drug Take-Back Client Service Team
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**DRUG DISPOSAL SERIALIZATION TRACKING SHEET INNER LINER TRACKING FORM**

Serialization Tracking Sheet should be validated by 2 pharmacy employees.

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

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

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

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

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

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.

FIGURE 1
Appendix D: Promotion Material

1. Sample Education Materials

**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 theft 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.dsa.gov
- www.petsmartaboutdrugs.com
- www.justthinktwice.com
**LIFE IN CHECK**

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

Working together to protect our families, communities and environment.

**DID YOU KNOW?**

- **192 AMERICANS** die every day from a drug overdose. "Do you.
- **46 MILLION** people at risk of taking medicines that are contaminated or expired.
- **83% OF PEOPLE** who misuse prescription drugs get them from a friend, relative or others. "Do you.

**GO TO RXDISPOSAL.LIFEINCHECK.COM TO FIND A RECEPTACLE NEAR YOU**

**HOW IT WORKS**

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

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

© Inmar 2020. Inmar authorizes the posting of the plan dated December 1, 2020 in accordance with Section 18C-23 (F) of the Santa Barbara County Code for the purposes of making it available to the public.
2. Sample Collector Marketing Support

SOCIAL MEDIA

Twitter: Crafting the Perfect Tweet

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

Facebook: Appealing to Your Audience

Facebook allows you to share longer posts with slightly larger images. However, longer isn’t always better. Shorter posts with compelling graphics tend to receive more shares and comments than longer posts, giving you more visibility within the Facebook news feed. Keeping your Facebook posts under 160 characters is ideal. Always include a link to an article or an image. Images on this social media platform are ideally 1200 x 630 pixels.

SAMPLE POSTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Help us stop the opioid epidemic. Dispose of your unused meds at OUR LOCATION.
DID YOU KNOW?
192 AMERICANS
die every day from a drug overdose.*

AT
EVERYDAY IS CONSUMER DRUG
TAKE-BACK DAY
Go to rxdisposal.Lifeincheck.com
to find a receptacle near you

*nci.gov

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 title here]
[Phone number]
[Contact or program email address]

[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.

In an effort to help reduce the risk of drugs in the home that can potentially harm children, teens or adults, [Pharmacy Name] has set up a convenient, safe drop-off location at 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 fueling in part by that availability. More than 5% of opioid prescription medications taken by new users are obtained from a friend, relative or other. 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. Users 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 its 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, Hours and Hours].

[Pharmacy Name] partnered with Inmar to manage this drug takeback 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

LifeIncCheck 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.
<table>
<thead>
<tr>
<th>ACCEPTED (ACEPTADOS)</th>
<th>NOT ACCEPTED (NO ACEPTADOS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>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)</td>
<td>Schedule I controlled substances Sustancias controladas de clasificación I</td>
</tr>
<tr>
<td>Unused or expired over-the-counter medication Medicamentos de venta libre no consumidos o vencidos</td>
<td>Illegal Drugs Drogas ilegales</td>
</tr>
<tr>
<td>Pet Medication Medicamentos para mascotas</td>
<td>Thermometers Termómetros</td>
</tr>
<tr>
<td></td>
<td>Inhalers Inhaladores</td>
</tr>
<tr>
<td></td>
<td>Aerosol Cans Latas de aerosol</td>
</tr>
<tr>
<td></td>
<td>Needles Agujas</td>
</tr>
<tr>
<td></td>
<td>Lotion/Liquids Lociones o Líquidos</td>
</tr>
<tr>
<td></td>
<td>Hydrogen Peroxide Agua oxigenada</td>
</tr>
</tbody>
</table>

---

**IN THE NEWS**

- **May 15, 2019**
  Inmar Launches LifeInCheck Prescription Drug Plan

- **October 22, 2018**
  Inmar Enhances Features To Its LifeInCheck Drug Disposal Program to Help Combat The Opioid Epidemic

- **October 30, 2019**
  Blue Cross NC, Inmar and Mutual Drug Provide 85 New Drop-Off Boxes for Safe Medication Disposal on National Take Back Day

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

CONTACT US

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© Inmar 2020. Inmar authorizes the posting of the plan dated December 1, 2020 in accordance with Section 18C-23 (F) of the Santa Barbara County Code for the purposes of making it available to the public.
4. Sample Social Influencer Content

“Recovery is Possible + An Easy Way You Can Help Fight The Opioid Epidemic”
By It’s a Fabulous Life

“EASY WAYS TO KEEP PRESCRIPTION DRUGS SAFE: 3 SIMPLE STEPS EVERY PARENT SHOULD TAKE TODAY”

“Tips for Practicing Medication Safety”

*Geo-targeted ads to store list zip codes and interest targeted ads to key terms such as caregiver, home care, nursing, nursing home care, phmeics, 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**
---|---|---
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 85009

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.

**CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE**

**UNITED STATES DEPARTMENT OF JUSTICE**

**DRUG ENFORCEMENT ADMINISTRATION**

**WASHINGTON D.C. 20537**

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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.

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.
<table>
<thead>
<tr>
<th>DEA REGISTRATION NUMBER</th>
<th>THIS REGISTRATION EXPIRES</th>
<th>FEE PAID</th>
</tr>
</thead>
<tbody>
<tr>
<td>RC0331049</td>
<td>08-31-2020</td>
<td>$1523</td>
</tr>
</tbody>
</table>

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

CLEAN HARBORS ARAGONITE
11600 NORTH APTUS ROAD
DUGWAY, UT 84022

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

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.
# Enforcement Action Summary Report

**Facility:** Aragonite

<table>
<thead>
<tr>
<th>Date Received</th>
<th>Agency</th>
<th>Enforcement Type</th>
<th>Alleged Violation</th>
<th>Proposed Penalty</th>
<th>Status</th>
<th>Resolution Date</th>
<th>Penalty Paid</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/20/2016</td>
<td>UDEQ</td>
<td>Notice of Violation</td>
<td>1) Storage facility for water supply had a leak at the time of inspection, 2) the public water supply storage vessel showed signs of a leak.</td>
<td>$0.00</td>
<td>Resolved w/o Penalty</td>
<td>12/14/2016</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

**EA Number:**  

**Description of Resolution:** Repaired the tanks.

<table>
<thead>
<tr>
<th>Date Received</th>
<th>Agency</th>
<th>Enforcement Type</th>
<th>Alleged Violation</th>
<th>Proposed Penalty</th>
<th>Status</th>
<th>Resolution Date</th>
<th>Penalty Paid</th>
</tr>
</thead>
<tbody>
<tr>
<td>2/8/2017</td>
<td>UDEQ - DDW</td>
<td>Notice of Violation</td>
<td>Failure to monitor and report for pesticides and volatile organic compounds in 2016.</td>
<td>$0.00</td>
<td>Resolved w/o Penalty</td>
<td>2/15/2017</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

**EA Number:**  

**Description of Resolution:** Updated testing was conducted.

<table>
<thead>
<tr>
<th>Date Received</th>
<th>Agency</th>
<th>Enforcement Type</th>
<th>Alleged Violation</th>
<th>Proposed Penalty</th>
<th>Status</th>
<th>Resolution Date</th>
<th>Penalty Paid</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/16/2018</td>
<td>UDEQ - Division of Air Quality</td>
<td>Notice of Violation</td>
<td>Failure to submit stack test results, deviation reports, leak detection and repair reports, Benzene NESHAP reports, semi-annual reports and compliance certifications in a timely manner.</td>
<td>$23,750.00</td>
<td>Resolved</td>
<td>5/21/2018</td>
<td>$23,750.00</td>
</tr>
</tbody>
</table>

**EA Number:**  

**Description of Resolution:**
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.

EA Number:  

Description of Resolution: Payment of a civil penalty.
THANK YOU.

INMAR.COM
linkedin.com/company/inmar/

635 Vine Street,
Winston-Salem, NC 27101