



**FINAL NOTICE OF DETERMINATION**  
**Product Stewardship Plan Review**  
**San Mateo County Ordinance No. 04736, Safe Medicine Disposal Ordinance**

**Date:** October 1, 2024  
**Plan Operator:** Med-Project LLC (Med-Project)  
Dr. Victoria Travis, National Program Director  
4096 Piedmont Ave., Unit 174, Oakland, CA 94611  
[victoria@med-project.org](mailto:victoria@med-project.org)

**Background:**

On January 16, 2020, the Department approved Med-Project's Stewardship Plan, dated April 15, 2019.

On May 31, 2023, the Director of the Division issued the Guidance for the Implementation of a Single System of Promotion and Program Goals ("Guidance Document") as authorized in sections 4.116.060(c) and 4.116.140 (b) of the Ordinance.

On August 10, 2023, MED-Project submitted to the Department a response to the conditions the Department included in the Notice of Determination sent to MED-Project on July 11, 2023. On September 18, 2023, the Department received the resubmission of the Revised Stewardship Plan ("Revised Plan").

On December 21, 2023, the Department issued a "Second Notice of Determination" to approve the Revised Stewardship Plan ("Revised Plan") subject to conditions.

On January 5, 2024, Med-Project accepted the conditions for the Revised Plan's conditional approval.

On March 21, 2024, the Department received the resubmission of the Stewardship Plan ("2<sup>nd</sup> Revised Plan").

**Plan Evaluation:**

The Department has evaluated the 2<sup>nd</sup> Revised Plan for compliance with the conditions of the Second Notice of Determination issued on December 21, 2023, the Ordinance, and the adoption of the guidance provided by the Department in the Guidance Document.

The following details the evaluation of MED-Project's response to the standing approval conditions:

- **Response to Condition #3:** The 2<sup>nd</sup> Revised Plan included more specific language regarding employee training for the host sites. Regarding the DOT training, MED-Project will provide training materials outlining the requirements of the Special Permit.
- **Response to Condition #4:** MED-Project requested the approval of medical waste incinerators Curtis Bay Energy, LP, and Stericycle, In., Warren Ohio facility (Section X. D of the 2<sup>nd</sup> Revised Plan) for the disposal of unwanted covered drugs per section 4.116.070(c) and 4.116.110(f) of the Ordinance. The Department evaluated the basis for the petition, including "ERM review of the Selected Municipal Waste Combustors, Medical Waste Incinerators, and Hazardous Waste Incinerators" report by ERM dated May 16, 2022. The information provided satisfies the requirements of the Ordinance.
- **Response to Condition #6:** Section of the Revised Plan specifies that "MED-Project" will provide educational and promotional material to licensed pharmacies, healthcare facilities, and veterinary facilities at least annually." Third-party partners and community organizations will also receive material upon request. This meets the requirement in section 4.116.060(a)(3) of the Ordinance and the Guidance Document.
- **Response to Condition regarding the "Plan Collection Goals":** Section VI of the 2<sup>nd</sup> Revised Plan specified the goal of "50% awareness among survey respondents" per the Guidance Document.

Department staff audited mail-back distribution sites to verify the implementation of the Stewardship Plan during the first quarter of 2024 and identify sites that were not operational. This was reported to MED-Project's representatives on May 17, 2024. At that time, the joint website, [www.medtakebacksanmateo.org](http://www.medtakebacksanmateo.org), listed those sites as operational. The Guidance Document in section IV.5 requires Stewardship Organizations to update website information regularly. Critical information regarding the operation of drop-off sites and mail-back distribution sites, such as non-operational sites, must be updated within 48 hours. MED-Project responded on May 30, 2024, stating that they will take steps to help all the Mail-Back Distribution Locations participating in the program better understand their responsibilities for providing services to the public.

### **Determination:**

Pursuant to the County Ordinance No. 04736 ("Ordinance") for Safe Medicine Disposal, the Director of the San Mateo County Environmental Health Services ("Department") approves Med-Project's four-year review of their Stewardship Plan (2<sup>nd</sup> Revised Plan) for Safe Medicine Disposal.

MED-Project, as the Stewardship Plan Operator in the representation of the participating producers, must maintain compliance with the Ordinance and follow the guidance of the Department as authorized in sections 4.116.060(c) and 4.116.140 (b) of the Ordinance, including but not limited to maintaining

the information on the joint website up to date and providing an expedite service in the event the kiosk fills up.

The Department requests detailed information in the subsequent annual reports. MED-Project shall include the amount by weight of covered drugs collected at each collection site with the information required per section 4.116.090 (a)(2) of the Ordinance. Also, the list of drop-off sites required in section 4.116.090 (a)(3) of the Ordinance shall include the type of service method site. This information will assist the Department in providing guidance on the distribution of sites within the County for equitable access to this service. Additionally, the Department expects MED-Project to maintain its services generally, up to and including responsiveness to community complaints, current service location posting, and sufficient levels of servicing drop off locations, all in compliance with the approved Stewardship Plan.

If you have any questions, please contact Liliana Mejia, Program Supervisor, at (650)339-9791, or [lmejia@smcgov.org](mailto:lmejia@smcgov.org).

Sincerely,

Heather Forshey, MS, REHS  
Director, Environmental Health Services

Cc: Liliana Mejia, Program Supervisor, San Mateo County Environmental Health Services