



# **A Product Stewardship Plan For Unwanted Medicine From Households**

King County, Washington  
December 14, 2015

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## **I. Introduction**

King County MED-Project LLC (“King County MED-Project”), on behalf of the participating companies identified in Appendix A, submits this Product Stewardship Plan (“Plan”) for Unwanted Medicine in compliance with the King County Board of Health Secure Medicine Return Regulations, BOH 11.50.010 – 11.50.160 (“Regulations”). The Regulations require pharmaceutical Producers<sup>1</sup> to develop a Product Stewardship Program to finance and manage the collection, transportation and disposal of Unwanted Medicine from King County households.

## **II. Stewardship Organization**

The Pharmaceutical Product Stewardship Work Group (“PPSWG”), a group of pharmaceutical Producers, has established King County MED-Project as the Stewardship Organization to operate the Plan.

## **III. Contact Information**

The primary contact person for King County MED-Project is:

Carrie Hoffman, Plan Development Director  
King County MED-Project  
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Washington, DC 20005  
202-530-6291  
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<sup>1</sup> All capitalized terms used but not otherwise defined herein shall have their respective meanings set forth in the Regulation.

## IV. Definitions

**Chain Pharmacy** is one of a group of pharmacies under common control, operation or ownership with locations inside of and outside King County.

**DEA** is the U.S. Drug Enforcement Administration.

**DEA Rule** is the DEA Final Rule, “Disposal of Controlled Substances,” 79 Fed. Reg. 53520 et seq., adopted on September 9, 2014.

**Healthcare Pharmacy** is a pharmacy that is located inside a medical facility such as a hospital or outpatient surgical facility.

**Independent Pharmacy** is a pharmacy that is local to King County and independently owned.

**King County MED-Project** is a limited liability company established by PPSWG, a group of pharmaceutical Producers, to serve as the Stewardship Organization for the Plan required under the Regulations.

**Kiosk Drop-Off Site** is a LEA or pharmacy hosting a King County MED-Project kiosk for the collection of Unwanted Medicine.

**Kiosk Drop-Off Site Host** is the designated contact person or persons at the kiosk drop-off site.

**Law Enforcement Agency** or **LEA** is a Sheriff’s Office or Police Department.

**Mail-Back Services** is the provision of pre-paid, pre-addressed envelopes for the collection and disposal of Unwanted Medicine.

**Maintenance Technicians** are service personnel who are trained to provide services related to kiosks that are part of the Program. This includes, but is not limited to, installing and responding to damaged kiosks. Maintenance Technicians will be employed, managed, and directed by King County MED-Project’s Vendor.

**Plan** or **Product Stewardship Plan** is the product stewardship plan presented in this submission by King County MED-Project.

**Program** or **Product Stewardship Program** is the product stewardship program set forth in this Product Stewardship Plan.

**Service Technicians** are service personnel trained to remove and transport Unwanted Medicine from the kiosks that are part of the Program. Service Technicians will be employed, managed, and directed by the Vendor.

**Stewardship Organization** is an organization designated by a group of Producers to act as an agent on behalf of each Producer to operate a product stewardship program.

**Take-Back Event** is an event sponsored by King County MED-Project with oversight by local law enforcement for the collection of Unwanted Medicine. Take-back events are also known as periodic collection events.

**Unwanted Medicine** is defined in section VI of this Plan.

**Vendor** is Stericycle Environmental Solutions, Inc. (“Stericycle”), the collection and transportation vendor for this Plan.

**WSPQAC** is the Washington State Pharmacy Quality Assurance Commission.

## V. Plan and Collection Goals

The goals of the Plan are described generally as follows. Additional detail on implementation is provided in section VII.

King County MED-Project anticipates that establishment of kiosk drop-off sites will begin in April of 2016 and continue throughout the year. Due to the shortened year, the Program expects to collect approximately half of the normal volume of Unwanted Medicine in kiosk drop-off sites during this implementation period. As a result, it is anticipated that more than the normal volume will be collected in supplemental take-back events and through mail-back services. In 2017, once all drop-off locations are fully operational, the program expects to collect approximately 480 pounds per kiosk drop-off site during the calendar year, resulting in approximately 60,500 pounds of Unwanted Medicine collected from kiosk drop-off sites. See section VII.A.11. for more information about kiosk drop-off site collection.

Based on take-back event collection totals in Alameda County, King County MED-Project anticipates collection of approximately 500lbs of Unwanted Medicine per take-back event in King County.

King County MED-Project mail-back packages have a capacity of 8oz. per package. Due to a lack of publicly available information on other mail-back programs, King County MED-Project is unable to accurately estimate mail-back collection totals in 2016. Actual collection in 2016 will be used to adjust subsequent years' collection goals.

Data from 2017 will be utilized to establish baseline collection and estimate collection goals for future years.

Anticipated Collection Amounts (Lbs):		
Collection Method	2016	2017
Drop-Off Sites	30,000	60,500
Take-Back Events	10,000	6,000
Mail-Back Services	5,000	6,000
Pounds Collected	45,000	72,500

Goal Area	Short-Term 2016 Goals	Long-Term Goals
Collection	<p>Kiosk drop-off sites: Establish kiosk drop-off sites at participating pharmacies and LEAs within the first 90 days. See <a href="#">Appendix B</a> for a list of drop-off sites that have expressed interest and <a href="#">Appendix C</a> for a list of possible additional drop-off site locations that we are in discussions with.</p> <p>Take-back events: Take-back events will be scheduled to supplement drop-off sites in order to best meet underserved areas and to meet the convenience standard. See section VII.B.1.</p> <p>Mail-back services: Available upon request to home bound and differentially-abled residents or where kiosk drop-off sites are not available.</p>	<p>Establish at least one kiosk drop-off site in every city, town or unincorporated community service area with an LEA or qualifying pharmacy and at least one additional kiosk drop-off site in each city, town or unincorporated community service area for each 30,000 residents.</p> <p>Take-back events and mail-back services will be provided to supplement kiosk drop-off sites in order to meet the convenience standard as defined in the Regulations.</p>
Education & Public Outreach	<p>Develop baseline number of website page views or unique visitors.</p> <p>Establish a baseline number of Law Enforcement Agencies; retail pharmacies; other pharmacies (healthcare, etc.); community groups; and other third parties contacted, and report appropriate statistics as outlined in the Survey and Annual Report sections of this Plan.</p> <p>Establish a baseline number of media outlets receiving press advisories, with a minimum of five outlets.</p> <p>Establish a baseline percentage of King County community centers reached.</p> <p>Establish a baseline number of messages to King County MED-Project returned within predetermined timeframe.</p>	<p>On an ongoing basis, King County MED-Project may revise and/or add communications materials based on changes to the Plan.</p> <p>King County MED-Project will evaluate media and public outreach as well as collect feedback by survey in order to make adjustments and improvements to the Product Stewardship Program. The review will measure percent awareness of the stewardship plan, assess to what extent kiosk 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 medicines used in the home. Results of the review will be published on the King County MED-Project website.</p>
Collector Outreach	<p>Contact LEAs and retail pharmacies and invite them to participate in the Plan. Set targets for LEAs and retail pharmacies.</p>	

## VI. Unwanted Medicine

For purposes of the Plan, “Unwanted Medicine” includes all materials identified as “Covered Drugs” under BOH 11.50.030.B. According to this provision of the Regulations, Covered Drugs means “a drug sold in any form and used by covered entities, including prescription, nonprescription, brand name and generic drugs.” Covered entities means “residents of King County, including individuals living in single and multiple family residences and other residential settings, and including other nonbusiness sources of prescription and nonprescription drugs that are unused, unwanted, disposed of or abandoned by residents as identified by the director.” BOH 11.50.030.C. Unwanted Medicine does not include the following:

- i. Expired undispensed samples direct from physicians’ offices;
- ii. Unused or expired drugs from hospitals and institutions;
- iii. Bulk animal pharmaceuticals from farms (business use);
- iv. Vitamins or supplements;
- v. Herbal-based remedies and homeopathic drugs, products or remedies;
- vi. Cosmetics, shampoos, sunscreens, toothpaste, lip balm, antiperspirants or other personal care products that are regulated as both cosmetics and nonprescription drugs under the federal Food, Drug, and Cosmetic Act (21 U.S.C. Chapter 9);
- vii. Hard surface and toilet disinfectant cleaners;
- viii. Physician administered drugs - drugs administered in hospitals or other clinical settings whereby a patient never handles drug product;
- ix. Drugs for which producers provide a pharmaceutical product stewardship or take-back program as part of a federal Food and Drug Administration managed risk evaluation and mitigation strategy (21 U.S.C. Sec. 355-1);
- x. Drugs that are biological products, meaning any virus, therapeutic serum, toxin, antitoxin, or analogous product applicable to the prevention, treatment or cure of diseases or injuries of man, as these terms are defined by 21 C.F.R. 600.3(h), if the producer already provides a pharmaceutical product stewardship or take-back program;
- xi. Medical devices, their component parts or accessories, or a covered drug contained in or on medical devices or their component parts or accessories;
- xii. Pet pesticide products contained in pet collars, powders, shampoos, topical applications, or other forms;
- xiii. Used, empty containers, vials, and pouches that do not contain a usable quantity of covered drugs;
- xiv. Pre-loaded products with a sharp attached containing prescription or over the counter medications;
- xv. Auto injectors; and
- xvi. Schedule I or other illicit drugs.

The DEA rule limits collection of controlled substances to Schedule II, III, IV, or V controlled substances that are lawfully possessed by an ultimate user or person entitled to dispose of an ultimate user decedent’s property. See DEA Rule §§ 1317.75(b) (kiosk drop-off sites)<sup>2</sup>; 1317.65(d) (take-back events); 1317.70(b) (mail-back services). Schedule I controlled substances, controlled substances that are not lawfully possessed as described above, and other illicit or dangerous substances will not be collected. Additionally, as these provisions of the DEA Rule limit collection of controlled substances to those lawfully possessed by an ultimate user or certain other persons, pharmacies are prohibited from disposing their own inventory or stock through the King County MED-Project program. See *also* § 1317.05.

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<sup>2</sup> For kiosk drop-off site collection, only certain substances “that are lawfully possessed by an ultimate user or other authorized non-registrant person may be collected.” § 1317.75(b). This language is similar to, but slightly different than, provisions limiting collection at take-back events and through mail-back services to ultimate users or other persons (lawfully) entitled to dispose of an ultimate user decedent’s property. See § 1317.65(d); § 1317.70(b).

Controlled substances collected pursuant to the Plan may be commingled with non-controlled substances at kiosk drop-off sites, take-back events, and through mail-back services per the DEA Rule. See §§ 1317.75(b) (kiosk drop-off sites); 1317.65(d) (take-back events); 1317.70(b) (mail-back services). Program kiosk drop-off sites, take-back events, and mail-back services will accept Unwanted Medicine, including controlled substances, in pill, capsule, aerosol or liquid form.

## VII. Collection of Unwanted Medicine

The King County MED-Project Plan provides for kiosk drop-off sites, take-back events, and mail-back services to collect Unwanted Medicine from all King County residents. These collection methods and any applicable legal requirements are described below.

### A. Kiosk Drop-Off Sites

#### 1. Outreach and Locations

Kiosk drop-off sites will be located throughout King County in order to best meet the convenience standard established by the Regulations, with convenient and equitable access for all King County residents through a system of kiosk drop-off sites. The kiosk drop-off sites are distributed based on population density and travel distance to the nearest kiosk drop-off site. This King County MED-Project system of kiosk drop-off sites will provide the residents of King County a number of different outlets to participate in the Program. King County MED-Project intends to locate kiosks at drop-off sites throughout King County in both the incorporated and unincorporated areas.

The King County MED-Project system of kiosk drop-off sites is the product of extensive outreach efforts. On November 11, 2014, King County MED-Project contacted all LEA and Pharmacy locations as provided by King County at <http://kingcountysecuremedicinereturn.org/king-county>. King County MED-Project provided the Director with copies of all letters sent.

King County MED-Project then contacted all locations by phone, email, and/or in person to assess interest in participation as a kiosk drop-off site and educate them on the latest Plan and proposed Program. All sites were contacted by the Program on numerous occasions, most recently in October and November of 2015, to identify any changes to management or contact information and confirm interest in Program participation.

Section VII.A.3. describes these outreach efforts. As of December 11, 2015, King County MED-Project has received expressions of interest from 124 drop-off locations (see [Appendix B](#)), and is continuing discussions with 101 locations (see [Appendix C](#)). The 124 drop-off sites expressing interest in Plan participation, supplemented with take-back events or mail-back services as necessary, will provide all residents in incorporated and unincorporated areas of King County an ongoing, year-round, safe, convenient, and equitable system for the disposal of Unwanted Medicine.

As required under BOH 11.50.060.D.2, the Plan will include as a kiosk drop-off site any potential pharmacy or LEA willing to voluntarily serve as a kiosk drop-off site and able to meet all applicable federal, state, and local laws, rules, and guidelines within three months of their offer to participate. Kiosk drop-off sites will be open year round and the kiosks will be accessible during the regular business hours of the kiosk drop-off site.

Existing kiosk drop-off sites were also contacted about participating in the Program, and all existing kiosk drop-off sites that expressed interest and can meet the requirements above will be included in the Program. Participation in the Program is contingent upon following the King County MED-Project Kiosk Collection process provided in section VII.A.9., including the use of the King County MED-Project Vendor. King County MED-Project will review any requests from an interested kiosk drop-off site host, such as an exception to the standard processes, on a case by case basis. King County MED-Project will notify King County if a request cannot be met.

Once a kiosk drop-off site host has signed an agreement with King County MED-Project and modified its DEA registration, and begins participating in the Plan, King County MED-Project shall assist the kiosk drop-off site with the decommissioning of any existing collection kiosks and with the transition from any previous disposal vendor to the King County MED-Project Vendor, if applicable.

These kiosk drop-off sites, who have expressed interest include:



King County MED-Project will sign an agreement with each participating location. A template for the King County MED-Project Kiosk Drop-Off Site Services Agreement can be found in [Appendix D](#). Pharmacies may only participate as kiosk drop-off sites if they modify their DEA registrations to become authorized collectors. Pursuant to 21 C.F.R. § 1301.51(b), pharmacies may modify their registrations to become authorized collectors by submitting a written request to the DEA or online at [www.DEAdiversion.usdoj.gov](http://www.DEAdiversion.usdoj.gov). This request must contain:

- The registrant's name, address, and registration number (as printed on the registration certificate);
- The collection methods the registrant intends to conduct; and
- A signature in accordance with § 1301.13(j).

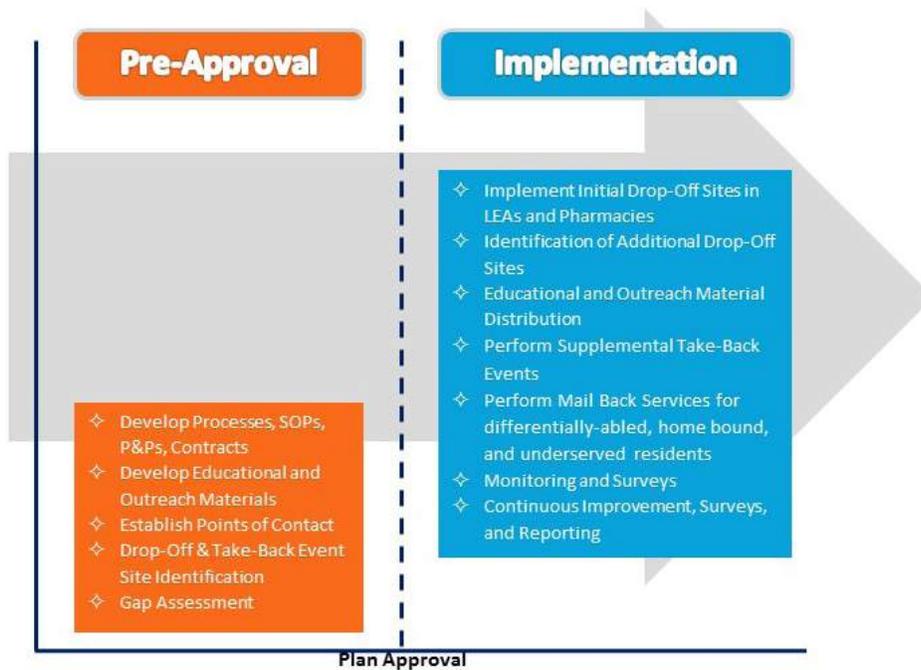
See § 1301.51(b). King County MED-Project will work with participating pharmacies to educate them as to how to modify their registrations. Additionally, upon Plan approval by King County, and subsequent approval by the WSPQAC, pharmacies may participate as kiosk drop-off sites. As discussed in section XII, King County MED-Project, upon Plan approval, will attend and present an overview of the approved Plan to WSPQAC for review and approval.

Once a pharmacy has signed an agreement to participate in the Program and successfully modified its registration with the DEA, King County MED-Project will notify King County of the pharmacy’s updated DEA registration information. King County MED-Project will also present the approved Plan to the WSPQAC and keep King County apprised of the status of WSPQAC’s review and approval.

## 2. Implementation

At a high level, the Plan will be implemented in two major phases:

### HIGH LEVEL RELEASE PLAN



King County MED-Project will continuously monitor the collection program to improve service delivery in order to best meet the convenience standard established by the Regulations. The current version of the more detailed Project Plan is provided in [Appendix E](#).

King County MED-Project will utilize take-back events and mail-back services to supplement areas that are not served by a kiosk drop-off site.

Beginning immediately after Plan approval by King County, promotional and educational materials will be distributed to participating pharmacies that need to modify their DEA registrations and, and a presentation of the approved Plan will be given to the WSPQAC for their review and approval. These materials will allow pharmacy kiosk drop-off sites to educate residents who would like to return Unwanted Medicine.

King County MED-Project will also partner with LEAs to hold take-back events throughout King County until kiosk drop-off sites are established. King County MED-Project will seek opportunities to partner with existing take-back initiatives when holding these take-back events, community partners, the County, or hold independent events.

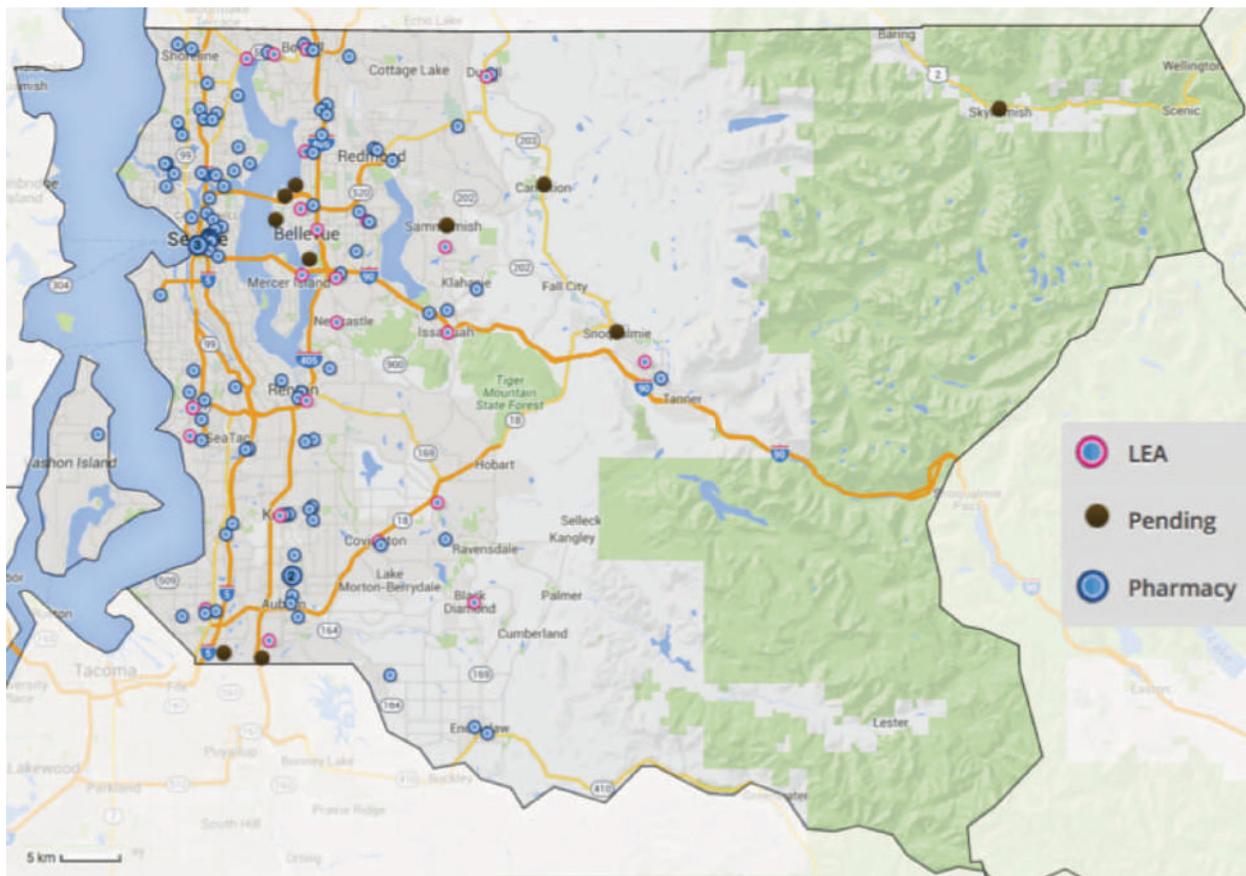
All King County LEAs have agreed to assist in take-back events regardless of their interest in becoming a kiosk drop-off site.

### 3. Convenience

This Program targets qualifying pharmacies as well as law enforcement agencies in order to provide equitable opportunities for all King County residents to safely and conveniently dispose of Unwanted Medicine. Where geographic or demographic areas are not covered by a kiosk drop-off site, take-back events or mail-back services will supplement Unwanted Medicine collection efforts to best meet the convenience standard across all incorporated and unincorporated areas of King County. The table below describes how King County MED-Project's system of kiosk drop-off sites satisfies the Regulations' convenience standard and identifies the areas for which supplemental service is required.

City/Town	King County Population	Number of Required Collection Locations	Current Voluntary Sites	Available Drop-off Locations	Interested Drop-off Locations	Meets Minimum Requirement
Algona	3014	1	0	2	1	Meets
Auburn	62761	3	2	14	6	Meets
Bellevue	122363	5	4	30	8	Meets
Black Diamond	4151	1	0	1	1	Meets
Bothell	17090	1	2	4	3	Meets
Burien	48072	2	3	10	4	Meets
Clyde Hill	2984	1	0	1	1	Meets
Covington	17575	1	0	7	2	Meets
Des Moines	29673	1	0	6	1	Meets
Duvall	6695	1	0	3	2	Meets
Enumclaw	10669	1	0	7	2	Meets
Federal Way	89306	3	1	19	4	Meets
Issaquah	30434	2	2	11	4	Meets
Kenmore	20460	1	1	5	2	Meets
Kent	118565	4	1	24	7	Meets
Kirkland	81480	3	1	19	5	Meets
Lake Forest Park	12598	1	1	3	1	Meets
Maple Valley	22684	1	1	5	2	Meets
Medina	2969	1	0	1	0	Pending
Mercer Island	22699	1	0	7	1	Meets
Milton	831	1	0	3	0	Pending
Newcastle	10380	1	0	3	1	Meets
Normandy Park	6335	1	0	2	2	Meets
North Bend	5731	1	0	3	2	Meets
Pacific	6514	1	0	1	0	Pending
Redmond	54144	2	1	13	4	Meets
Renton	90927	4	2	23	6	Meets

Sammamish	45780	2	1	4	1	Pending
SeaTac	26909	1	0	2	2	Meets
Seattle	608660	21	8	140	41	Meets
Shoreline	53007	2	1	14	3	Meets
Snoqualmie	10670	1	1	3	0	Pending
Tukwila	19107	1	0	6	1	Meets
Woodinville	10938	1	1	6	2	Meets
Beaux Arts Village	299	1	0	0	0	Pending
Carnation	1786	1	0	0	0	Pending
Hunts Point	394	1	0	0	0	Pending
Skykomish	198	1	0	0	0	Pending
Yarrow Point	1001	1	0	0	0	Pending
<b>TOTALS:</b>		80	34	402	122	



Kiosk drop-off sites expressing interest in King County MED-Project participation are depicted in the map above. As indicated in the map, with proposed coverage by 124 kiosk drop-off sites, there are 10 areas as currently underserved according to the King County Regulations. While King County MED-Project will continue seeking a kiosk drop-off site in these locations, they are underserved currently either because no qualified sites are available or no qualified sites are willing to participate in the Plan.

To demonstrate that all King County residents will be able to dispose of Unwanted Medicine conveniently through the Program, the following review outlines how each area in which the convenience standard cannot be met with kiosk drop-off sites will be served with supplemental take-back events and/or mail-back services. If the convenience standard is not met through the kiosk drop-off sites in the incorporated or unincorporated area, King County MED-Project will work with the LEAs to hold take-back events. King County MED-Project will also provide the residents of that incorporated or unincorporated area information on how to participate in the mail-back services and how to access nearby kiosk drop-off sites.

**Medina:** King County MED-Project is in discussions with the Medina Police Department at 501 Evergreen Point Road, Medina, WA 98104 regarding their interest to become a kiosk drop-off site.

**Milton:** King County MED-Project is in discussions with the Milton Police Department at 1000 Laurel St Milton, WA 98354 and the Safeway Pharmacy at 900 Meridian E Suite 23, Milton, WA 98534 regarding their interest to become a kiosk drop-off site.

**Pacific:** King County MED-Project is in discussions with the Pacific City Police Department at 133 3rd Ave SE, Pacific, WA 98047 regarding interest to become a kiosk drop-off site.

**Sammamish:** The Sammamish City Police Department at 801 228th Ave SE, Sammamish, WA 98075 has expressed interest in serving as a kiosk drop-off site however Sammamish requires two kiosk drop-off sites in the city in order to meet the convenience standard. King County MED-Project is in discussions with the Rite Aid Pharmacy at 3066 Issaquah-Pine Lake Rd SE, Sammamish, WA 98075 and the Safeway Pharmacy at 630 228th Ave NE, Sammamish, WA 98074 regarding their interest to become a kiosk drop-off site.

**Snoqualmie:** King County MED-Project is in discussions with the Snoqualmie Police Department at 34825 SE Douglas St, Snoqualmie, WA 98065 regarding their interest to become a kiosk drop-off site.

**Beaux Arts Village:** There is no pharmacy or LEA site in this city. King County MED-Project will work with the Bellevue Police Department, which borders the city, to hold a take-back event.

**Carnation:** There is no pharmacy or law enforcement site in this community. The City of Carnation contracts with the King County Sheriff's Office for LEA services. King County MED-Project will work with the King County Sheriff's Office to conduct take-back events.

**Hunts Point:** There is no pharmacy or law enforcement site in this community. Hunts Point contracts with the Medina Police Department for LEA services. King County MED-Project will work with the Medina Police Department to conduct take-back events.

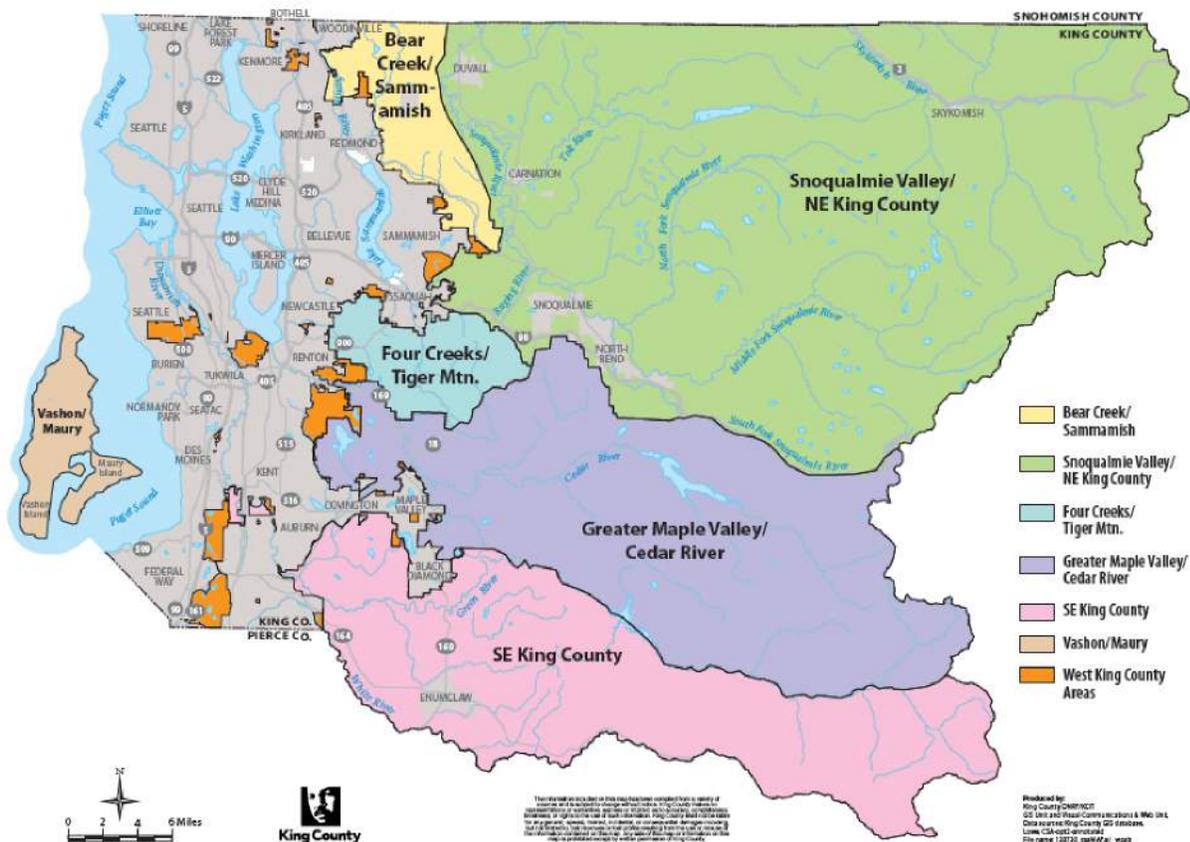
**Skykomish:** There is no pharmacy or law enforcement site in this community. Skykomish contracts with the King County Sheriff's Office for LEA services. King County MED-Project will work with the King County Sheriff's Office to conduct take-back events.

**Yarrow Point:** There is no pharmacy or law enforcement site in this community. Yarrow Point contracts with the Clyde Hill Police Department for law enforcement services. King County MED-Project will work with the Clyde Hill Police Department to conduct take-back events.

Unincorporated areas of King County are identified below along with whether they can satisfy the convenience standard with kiosk drop-off sites.

Unincorporated Community Service Area (CSA)	King County Population	Number of Required Collection Locations	Available Drop-off Locations	Interested Drop-off Locations	Meets Minimum Requirement
Bear Creek/ Sammamish	42140	2	0	0	Pending
Four Creeks/ Tiger Mountain	12600	1	0	0	Pending
Greater Maple Valley / Cedar River	17000	1	0	0	Pending
Snoqualmie Valley/ NE King County	26100	1	0	0	Pending
Southeast King County	28800	1	1	1	Meets
Vashon/Maury	10600	1	1	1	Meets
West King County Areas	126000	5	5	0	Pending
TOTALS:		12	7	2	

## Unincorporated King County Community Service Areas





#### **4. Drop-Off Site Kiosk Placement and Maintenance Program**

Kiosk placement shall be the responsibility of King County MED-Project at LEAs and pharmacy kiosk drop-off sites if the drop-off site has identified a placement location and requested assistance. All kiosks in the Program must be securely placed and maintained inside a collector's registered location or law enforcement's physical location in accordance with DEA Rule §§ 1317.75(d)(1) and 1317.35(a). At pharmacies, kiosks will be placed in the immediate proximity of a designated area where controlled substances are stored and at which an employee is present (*i.e.*, can be seen from the counter), pursuant to § 1317.75(d)(2). Costs associated with placement and maintenance will be paid by King County MED-Project per the contracts with the kiosk drop-off sites.

The maintenance program will address items such as:

- Periodic inspection of kiosk drop-off sites to monitor general wear and tear.
- Service Technician access to the kiosk drop-off sites during the regularly scheduled pick-ups and notification of a Maintenance Technician if necessary.
- Reporting by the LEA of damage to a kiosk drop-off site or requested maintenance service.

#### **5. Training**

Operational procedures, including training, are the responsibility of the kiosk drop-off site. King County MED-Project will support training from the Vendor if agreed to with the kiosk drop-off site. Additionally, Vendor will manage a support hotline to answer questions and monitor comments for participating kiosk drop-off sites.

#### **6. Service Technicians and other Vendor Employees**

The Service Technicians servicing the Unwanted Medicine deposited at a kiosk drop-off site will be independent of the Maintenance Technicians. This ensures a system of monitored communication and an additional level of security to the management of the Plan. The Service Technicians collecting and transporting the Unwanted Medicine will complete an initial two-week program of comprehensive in-house classroom and hands-on training under the direction of a Certified Hazardous Materials Manager, certified Senior Environmental Health and Safety Manager. This training includes instruction on:

- United States Department of Transportation ("DOT") hazardous materials requirements;
- United States Environmental Protection Agency ("EPA") waste characterization requirements;
- Resource Conservation and Recovery Act ("RCRA") hazardous waste requirements;
- DEA controlled substances transfer protocols;
- Occupational Safety and Health Administration ("OSHA") requirements; and
- Health Insurance Portability and Accountability Act ("HIPAA") requirements.

Upon completion of the initial two-week training period, new hires are assigned to a trained senior technician for two-weeks to perform client services under direct supervision. At the end of this second two-week period, the new hires are formally evaluated to determine whether they can independently perform client services. Service Technicians must complete a 24 or 40-hour Hazardous Waste Operations and Emergency Response Standard ("HAZWOPER") course. Additionally, Service Technicians must complete annual refresher training that includes 8-hour training on DOT, HAZWOPER, HIPAA, OSHA, RCRA, and Safety and Security training. Finally, Service Technicians receive ongoing training in the form of daily "tips", weekly meetings, and online refresher courses. All Vendor employees servicing take-back events, kiosk drop-off sites, or mail-back collection will have a training base similar to that of Service Technicians, with customized training as needed.

## 7. Call Center

Questions from residents of King County will be managed by a call center with an interactive voice response (IVR) system and the support of an operator available from 8:00am to 5:00pm PST Monday through Friday. If the operator is busy, a resident can leave a message to which the operator will respond. Calls outside of the available hours will be directed to an answering machine. Calls will be returned during business hours, 8:00am – 5:00pm PST Monday – Friday. All operators will be trained to respond based on the requirements set by King County MED-Project.

The IVR will answer general questions, including questions on the following topics:

1. Items that can be disposed;
2. Disposal options; and
3. Direction to the Program website for additional information.

Because the list of kiosk drop-off sites is subject to change, King County residents will be directed to the King County MED-Project website or to an operator for detailed information about kiosk drop-off site locations and service hours.

## 8. Kiosk Specifications

A kiosk will be offered to all host locations. Pursuant to § 1317.75(e), King County MED-Project kiosks at pharmacies will:

- Be securely fastened to a permanent structure;
- Be securely locked, substantially constructed containers with a permanent outer container and removable inner liner;
- Include a small opening in the outer container that allows contents to be added to the inner liner, but does not allow removal of the inner liner's contents;
- Prominently display a sign indicating that only Schedule II-V controlled and non-controlled substances are acceptable to be placed in the kiosk; and
- Have the small opening in the outer container locked or made inaccessible to the public when a drop-off site employee is not present.

The design of the pharmacy kiosk and proposed signage ([Appendix F](#)) satisfies these requirements through the use of heavy gauge steel, multiple locking mechanisms, including a locking mechanism on the drop slot, a tamper-proof slot and commercial hinges. The design will increase the likelihood of consumer participation by providing easy access to wheelchair bound users. The locking mechanism on the drop slot will prevent kiosk over-flow once the container has reached its maximum level. King County MED-Project pharmacy kiosks will come with appropriate regulatory signage and instructions to residents, including an instruction to remove personal information from any Unwanted Medicine or its packaging before depositing them and language required under the DEA Rule<sup>3</sup>.

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<sup>3</sup> Specifically, as required under § 1317.75(e)(4), all kiosks will prominently display a sign stating that: "Only Schedule II-V controlled and non-controlled substances that are lawfully possessed by the ultimate user are acceptable to be placed in the kiosk. Schedule I controlled substances, illicit or dangerous substances, and any controlled substances not lawfully possessed by the ultimate user may not be placed in the kiosk."

Additionally, under § 1317.60(a), King County MED-Project kiosk inner liners will:

- Be waterproof, tamper-evident, and tear-resistant;
- Be removable and sealable immediately upon removal without emptying or touching kiosk contents;
- When sealed, make the contents of the inner liner not viewable from the outside;
- Clearly indicate the size of the inner liner; and
- Bear a permanent, unique identification number for tracking purposes.

While the DEA Rule does not require LEA kiosks to meet these same requirements, King County MED-Project will offer these kiosks and inner liners to LEAs. See DEA Rule at 53531.

## **9. Kiosk Collection**

Under § 1317.05(c)(2)(iv), pharmacy kiosk drop-off site hosts must dispose of sealed inner liners and their contents either on-site, through common or contract carrier delivery to, or pick-up by, a reverse distributor or distributor, or with DEA assistance.

Section 1317.75(c) prohibits the counting, sorting, inventorying, or individual handling of any substances deposited into a pharmacy kiosk. Additionally, § 1317.60 limits inner liner access to employees of the collector and requires two employees to immediately seal the inner liner upon its removal from the pharmacy kiosk's permanent outer container. See § 1317.60(b), (c). § 1317.75(g) provides that pharmacy kiosk inner liner installation or removal shall be performed "by or under the supervision of at least two employees of the authorized collector." The pharmacy kiosk sealed inner liner must not be opened, x-rayed, analyzed, or otherwise penetrated. See § 1317.60(c).

At LEA kiosk drop-off sites, Vendor and the LEA will maintain any records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence pursuant to § 1317.35. Law enforcement will record the following information at kiosk drop-off sites using inner liners: the unique identification number of the sealed inner liner and the size of the sealed inner liner transferred to Vendor. See § 1317.35. Additionally, any Unwanted Medicine will be stored in a manner to prevent the diversion of controlled substances and consistent with the LEA's standard procedures for storing illicit controlled substances. Collected Unwanted Medicine will be transferred to the disposal facility in a manner to prevent the diversion of Unwanted Medicine and consistent with the LEA's standard procedures for transferring illicit controlled substances.

King County MED-Project's drop-off site collection system complies with these DEA requirements for pharmacy and LEA drop-off sites. Vendor, Pharmacies and LEAs participating in the MED-Project plan will keep all records required under the DEA Rule, including those required under §§ 1304 and 1317.35. Pharmacy kiosk drop-off sites and the Vendor will be instructed never to count, sort, inventory, or individually handle kiosk contents. However, pharmacy kiosks will be located where an employee is present and LEA kiosks located inside the LEA's physical location, affording employees the opportunity to visually inspect Unwanted Medicines residents attempt to deposit. See section VII.A.6.

Pick-up of Unwanted Medicine collected at kiosk drop-off sites will be scheduled for all kiosk drop-off sites, year-round, based on their regular business hours volume collected. When arriving at a kiosk drop-off site, the kiosk will be reviewed by the Service Technicians for any damage. If damage is found, the Service Technician will note the need for repair via an electronic reporting log. This electronic report will be transmitted to a Maintenance Technician who will respond to specific repair requests.

Unwanted Medicine will be securely removed from the kiosk by a Service Technicians and kiosk drop-off site employees following the Standard Operating Procedures outlined in the Kiosk Drop-Off Site Services Agreement attached as Appendix D. Specifically, two kiosk drop-off site employees will hold the two keys to unlock the kiosk. Once the kiosk is unlocked, these two employees will remove the kiosk inner liner and immediately and effectively seal it with a plastic zip-tie. The inner liner provided in the kiosk will be opaque to prevent visual recognition of the contents. The sealed inner liner will not be opened, x-rayed, analyzed, or otherwise penetrated.

Under the supervision of two kiosk drop-off site employees, the Service Technicians will take the sealed inner liner to a secure vehicle for containment. The inner liner (permanent and unique identification number already marked on the inner liner) will be recorded for tracking. The inner liner will then be placed in a container for shipment. This shipping container will be marked with a unique barcode label to track the container to the disposal site. The shipping container will be secured with tamper evident tape to prevent removal of any material during transport.

## **10. Disposal of Kiosk Contents**

The Vendor shall manage the Unwanted Medicine from kiosk drop-off sites in compliance with all applicable legal requirements.

Pursuant to § 1317.95, two Vendor employees will transport Unwanted Medicine directly to the destruction facility (constantly moving toward the destruction facility without unnecessary, unrelated, or extended stops). These two employees will load and unload, or observe the loading and unloading, of the Unwanted Medicine at the destruction facility. These two employees will also handle or observe the handling of the Unwanted Medicine at the destruction facility until it is rendered non-retrievable, personally witnessing destruction.<sup>4</sup>

All shipments containing the Unwanted Medicine will be transported via permitted ground haulers of waste in compliance with section XII.D. The Vendor will utilize leased vehicles to manage the service of the kiosk drop-off sites. All vehicles will be permitted and maintained by the Vendor. Permits will comply with all local, state and federal requirements for shipment of the Unwanted Medicine. All Unwanted Medicine will be destroyed no later than 30 calendar days after receipt. See section VIII.B. for additional details.

All haulers are trained to meet all applicable local, state and federal requirements. All haulers will adhere to all applicable security requirements and will be monitored periodically by the Vendor's managers to ensure compliance of each hauler. All shipping containers will be destroyed in their intact, closed state at a permitted hazardous waste incineration facility. Following disposal, a Certificate of Disposal ("COD") will be retained via electronic copy.

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<sup>4</sup> Section 1317.35 applies LEA storage and transfer requirements not to the LEA itself, but instead to "[a]ny controlled substances collected by law enforcement through a take-back event, mail-back program, or collection receptacle . . ." (emphasis added). § 1317.35(c), (d). Thus, the storage and transfer of Unwanted Medicine collected by LEAs will also comply with the LEA requirements outlined above.

## **11. Frequency of Pick-Up**

Initially, all drop-off sites will be scheduled for a monthly pick-up from the kiosk. The Vendor will communicate with the kiosk drop-off site in the event the frequency of pick-up needs to be increased or decreased based on the volumes collected over time. It is anticipated that the average site will generate up to 40 pounds of Unwanted Medicine per service, per kiosk drop-off site. The Vendor will monitor the exact volumes per service to ensure that all sites are receiving the appropriate service frequency. The Vendor will manage services as frequently as necessary to prevent overflow of the kiosk without providing unnecessary interruption to the participating kiosk drop-off site. Moreover, the Vendor will monitor the weight of Unwanted Medicine generated at each participating kiosk drop-off site via an electronic catalog retained at the local transfer facility.

The proposed electronic catalog is Vendor's proprietary software system that also allows for tracking of service data not available in the standard required shipping paperwork. This software system will provide the opportunity for Service Technicians to communicate the need for kiosk repairs and other relevant information to ensure the most effective management of the Program. This information will be transmitted electronically within 24 hours of a service event to Program Managers. These Managers will direct communications to necessary personnel to provide response and support of the needs of the participating kiosk drop-off sites.

## **12. Procedures if a Kiosk is Full Prior to Scheduled Pick-Up**

The kiosk provided to the kiosk drop-off site will contain a visual indicator to notify the kiosk drop-off site host if the kiosk is full. Upon such notification that the kiosk is full, the kiosk drop-off site host shall notify the Vendor of the need for service.

The Vendor shall provide a network of trained Service Technicians within King County. The Vendor will communicate this request to field managers responsible for Service Technicians in King County. The Vendor will direct service to a trained Service Technician who is in closest proximity to the kiosk drop-off site requesting the service. This process provides for a timely response to kiosk drop-off sites requiring service prior to the scheduled date.

Service timelines will be assessed based on the specific characteristics of the kiosk drop-off site's need. If necessary, the Vendor will be able to respond within hours of the request. If the request does not require an urgent response, the Vendor will plan the response within 2 to 3 business days of the request. The Vendor will not exceed one business week from the initial request. In the interim, pharmacy drop-off site hosts shall be instructed to have two employees remove and immediately seal the inner liner in accordance with the DEA requirements outlined above. These sealed inner liners will be stored in accordance with the requirements of § 1301.75(c), which provides for storage at the registered location in a securely locked, substantially constructed cabinet or a securely locked room with controlled access. LEAs will store collected controlled substances in a manner preventing diversion and consistent with that agency's standard procedures for storing illicit controlled substances. See § 1317.35(c).

### **13. Patient Privacy**

Instructions at each kiosk will inform people who deposit Unwanted Medicine that they should completely cross out, remove or otherwise make unreadable any and all personally identifiable information on the drug containers and packaging before depositing them in the kiosk. In cases where people follow the instructions, there will be no personally identifiable information.

For those people who do not follow the directions on the kiosk, the Vendor has additional protections available for keeping their personally identifiable information safe and secure. Service Technicians are well-trained in managing items containing sensitive patient information. Privacy training is part of a Service Technician's prerequisite for field services. Finally, opaque inner liners meeting all DEA requirements will also help secure patient information. The process for securing the liner will take place at the kiosk drop-off site by a Service Technician.

### **14. Unplanned Event Preparedness**

The Vendor maintains a network of emergency responders that can be called on in the case of an emergency or spill incident. Vendor ensures compliance of all service providers through a business confidential qualification process. This process reviews the compliance history, management structure, financial stability and other key indicators of a reliable emergency response service provider. This system ensures that all participating vendors in the Program will meet King County requirements as outlined in the Regulations. Emergency responders will bring all necessary equipment in order to manage the specific needs of the kiosk drop-off site requiring emergency response. Responders will be trained to access and remove a damaged kiosk. The responders will also be trained to adhere to all security requirements required within the Program.

A major event, such as a flood, earthquake, or fire, may require response by a service team. This event can jeopardize the security characteristics of the kiosk as well as the structural integrity of the participating location. The team will assess the safety of the area along with the locations to be serviced. Once it is determined the area is safe for access, the team will work to remove the kiosks within the affected area. Once all repairs are completed at the site, a team will return to install a new kiosk.

Along with major event preparedness, the Vendor provides timely responses to events that may cause an inconvenience to the kiosk drop-off sites. An example of this kind of event would be if the kiosk is giving off an odor prior to the scheduled service date. The Kiosk Drop-off Site Host will contact the Vendor via the dedicated phone number mentioned below. The Vendor is able to respond within two to three (2-3) hours in most cases when notified of a need for emergency response. If the request is not an emergency that poses an immediate threat to the environment or health, the Vendor will respond to a service location within one to two (1-2) business days of the event.

Personal items that a resident inadvertently drops into the kiosk (i.e. dentistry, watch, keys, wallet, etc.) will not be retrieved.

## **B. Take-Back Events**

King County MED-Project will supplement kiosk drop-off site collection with take-back events and mail-back services until sufficient kiosk drop-off sites are attained to meet the service convenience standards. Take-back events will begin with Program implementation.

### **1. Method**

King County MED-Project will work with participating law enforcement agencies to ensure take-back events are compliant and successful. Some King County residents may be familiar with the DEA National Drug Take-Back Days each April and September. Similarly, King County MED-Project will group take-back events biannually in February and July to maximize the effectiveness of advertising and to offer King County residents take-back disposal opportunities in addition to those conducted by the DEA. During the first year of implementation, King County MED-Project will group the take-back events within the first several months of implementation. All events will be promoted and communicated to the public through local communication channels as outlined in [Appendix G](#).

The process of conducting take-back events will meet all applicable legal requirements. King County MED-Project will contract with LEAs to conduct take-back events. These contracts will provide for the collection, transportation, and disposal of Unwanted Medicine from take-back events and ensure that all requirements of participating LEAs are met. King County MED-Project will work with LEAs to accommodate any reasonable requirements.

### **2. Procedures**

King County MED-Project will partner with LEAs to ensure that at least one law enforcement officer oversees collection at all take-back events pursuant to DEA Rule § 1317.65(a), (b). The law enforcement officers will maintain control and custody of all Unwanted Medicine collected at take-back events from collection until secure transfer, storage, or destruction of the Unwanted Medicine, as required by § 1317.65(b). Only ultimate users and persons authorized to dispose of an ultimate user decedent's property in lawful possession of controlled substances in Schedules II-V may transfer these substances to the LEA during the event. No other person will handle controlled substances at take-back events under § 1317.65(e); however, Vendor may assist LEAs in the collection of Unwanted Medicine at take-back events. See DEA Rule at 53539.

Under § 1317.65(c), all take-back events will have at least one collection receptacle, and such receptacles should be securely locked, substantially constructed containers with an outer container and removable inner liner as specified in § 1317.65(c). The outer container will include a small opening that allows contents to be added to the inner liner, but does not allow removal of the inner liner's contents. Vendor and the LEA will maintain all records of removal, storage, or destruction of the collected Unwanted Medicine in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence pursuant to § 1317.35. Law enforcement will record the following information at take-back events using inner liners: the unique identification number of the sealed inner liner and the weight of the sealed inner liner transferred to Vendor. See § 1317.35. Any collected Unwanted Medicine will be stored to prevent the diversion of controlled substances and consistent with the LEA's standard procedures for storing illicit controlled substances. Any storage of Unwanted Medicine by Vendor will also comply with the applicable security requirements of §§ 1301 and 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances. Unwanted Medicine collected by the LEA will be transferred to the disposal facility following the procedures outlined in section VII.A.9. All Unwanted Medicine will be destroyed no later than 30 calendar days after receipt at the disposal facility.

Take-back events will typically be staffed by three Vendor employees. Vendor will work in coordination with King County MED-Project, King County, and local law enforcement to monitor and ensure collection of all material at take-back events is compliant with legal requirements and meets the published expectations of the planned event. Vendor will work in conjunction with local law enforcement to ensure all material is placed in a compliant collection receptacle and securely shipped to meet applicable legal requirements. Any material that is not Unwanted Medicine or does not meet legal requirements will be rejected by Vendor.

Following the completion of each event, containers will be securely packaged, labeled and shipped in compliance with all applicable legal requirements. Containers and inner liners will be tracked via unique barcodes to a permitted hazardous waste incineration facility, where they shall be incinerated. Vendor will ship the containers (and inner liners) in accordance with the requirements outlined in section XII.D.

### **3. Fees and Costs**

King County MED-Project shall pay all administrative and operations costs and fees associated with the take-back events.

#### **C. Mail-Back Services**

King County MED-Project will provide mail-back services at no cost to differentially-abled and home bound residents of King County and to supplement kiosk drop-off sites and/or take-back events as necessary to satisfy the service convenience standard. Mail-back packages will be pre-paid and pre-addressed, and mail-back services shall comply with all applicable local, state and federal requirements. Pursuant to DEA Rule § 1317.70(c), the mail-back packages will be:

- nondescript and without any markings or information potentially indicating that they contain Unwanted Medicine, including controlled substances;
- water and spill-proof, tamper-evident, tear-resistant, and sealable;
- pre-addressed with and delivered to the Vendor's registered address;
- pre-paid;
- provided a unique identification number enabling tracking; and
- provided with instructions indicating the process for mailing back the packages, accepted substances, a notice about mailing restrictions, and a notice that only packages provided by the Vendor will be accepted for destruction.

Ultimate users and persons lawfully entitled to dispose of an ultimate user decedent's property will not be required to provide any personally identifiable information when using mail-back services to dispose of Unwanted Medicine. See § 1317.70(d). King County MED-Project may implement a system under which ultimate users or persons lawfully entitled to dispose of an ultimate user decedent's property may notify the Vendor they are mailing a mail-back package simply by providing the mail-back package's unique identification number. See § 1317.70(d). As required under § 1317.70(e), the Vendor will only accept mail-back packages it made available by mail (or packages lawfully forwarded under DEA requirements). Within three business days of receipt, the Vendor will notify the DEA if it receives mail-back packages likely containing controlled substances that the Vendor did not make available or did not agree to receive pursuant to DEA requirements. In accordance with § 1317.70(f), when mail-back packages are received, only employees of the Vendor will handle the mail-back packages. Mail-back packages will not be opened, x-rayed, analyzed, or otherwise penetrated upon receipt by Vendor. See § 1317.70(f). The Vendor will keep all records required under the DEA Rule, including those identified in § 1304.22(f):

- For mail-back packages made available: date, number made available, and unique identification number;
- For mail-back packages received: date received and unique identification number; and
- For mail-back packages destroyed: number of mail-back packages destroyed, date and method of destruction, unique identification number, and names and signatures of two registrant employees that witnessed destruction.

### **1. Mail-Back Package Availability**

Differentially-abled or home bound King County residents, as well as residents living in areas underserved by kiosk drop-off sites, may request mail-back packages by calling the call center or through a link on the King County MED-Project website. In areas of the County underserved by kiosks, specifically in rural areas where it will be difficult to access a kiosk or take-back event, King County MED-Project will work with the city/town to provide mailers at a centralized location such as a town hall. Home healthcare professionals providing services to differentially-abled or home bound residents may also request mail-back packages on behalf of a resident through the call center or through a link on the King County MED-Project website. Upon such request, Vendor shall provide mail-back packages which shall comply with the requirements of the DEA Rule.

Each mail-back package will contain an insert with instructions for use and information about other options for disposing of Unwanted Medicine. See [Appendix H](#) for a sample envelope.

### **2. Mail-Back Package Collection and Disposal**

Requests to receive mail-back packages will be taken through the call center or a link on the King County MED-Project website. Stericycle will track packages utilizing First Class Mail through the United States Postal Service. All packages shall be logged upon shipment to residents as well as upon delivery at the approved disposal facility using a unique barcode. Residents will be directed to follow the instructions provided in the mail-back package and to place their Unwanted Medicine in the pre-addressed/pre-paid package. The USPS estimates up to three business days for delivery of the First Class Mail. The mail-back package shall be sent to the approved destruction facility. Once arriving at the Stericycle Inc., Indianapolis Indiana Facility, the mail-back packages shall be, scanned for receipt verification and then rendered non-retrievable. After this destruction, any remaining mail-back package materials are incinerated at the Covanta Indianapolis, Inc. Indianapolis Resource Recovery Facility. See [Appendix I](#) for more details. Any storage of filled mail-back packages by Vendor will comply with the applicable security requirements of DEA Rule section 1317, including the requirement that Unwanted Medicine is securely stored in a manner consistent with the security requirements for Schedule II controlled substances. All Unwanted Medicine will be destroyed promptly.

### **3. Direct Mailings**

King County MED-Project will contact King County residents who live in areas of King County that are underserved by kiosk drop-off sites through the use of direct mailings. Direct mailings will promote mail-back services and, once scheduled, local take-back events. Mailing lists for underserved areas will be provided by King County.

#### 4. Law Enforcement Mail-Back Programs

King County MED-Project has begun outreach to LEAs to determine their interest in providing mail-back programs. As of December 10, 2015, the following LEAs have been contacted and outreach will be on-going.

<b>Name</b>	<b>Street Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>
Bothell Police Department	18410 101st Ave NE	Bothell	WA	98010
Kenmore Police Department	1812068th Ave NE	Kenmore	WA	98028
Kirkland Police Department	123 5th Ave	Kirkland	WA	98030
Lake Forest Park Police	17425 Ballinger Way NE	Lake Forest	WA	98155

King County MED-Project will consider using, among existing and other potential mail-back options, interested LEAs to provide mail-back services as authorized under DEA Rule §§ 1317.35 and 1317.70. Pursuant to § 1317.70, King County MED-Project's LEA mail-back programs would only collect Schedule II through V controlled substances that are lawfully possessed by an ultimate user (or other authorized persons). Controlled and non-controlled substances could be commingled in the mail-back program. LEAs would make mail-back packages available to ultimate users (or other authorized persons) for the collection of Unwanted Medicine. These mail-back packages would be returned via first class mail to the LEA. Any person could partner with a LEA to make mail-back packages available.

The mail-back packages would meet the specifications outlined in § 1317.70(c). Specifically, mail-back packages from LEA programs would be:

- nondescript and without any markings or information potentially indicating that they contain Unwanted Medicine, including controlled substances;
- water and spill-proof, tamper-evident, tear-resistant, and sealable;
- pre-addressed with and delivered to the LEA's physical address;
- pre-paid;
- provided a unique identification number enabling tracking; and
- provided with instructions indicating the process for mailing back the packages, accepted substances, and a notice about mailing restrictions.

Under § 1317.70(d), the LEA may implement a system under which ultimate users (or other authorized persons) could notify the LEA they are mailing a mail-back package simply by providing the mail-back package's unique identification number. In accordance with § 1317.70(f), when mail-back packages are received, only LEA officers employed by the LEA or a law enforcement component of a federal agency would handle the mail-back packages. LEAs participating in the King County MED-Project Plan as mail-back service providers would meet all requirements of § 1317.35. Specifically, these LEAs would: (1) maintain any records of removal, storage, or destruction of the collected Unwanted Medicine (which includes controlled substances) in a manner consistent with the LEA's recordkeeping requirements for illicit controlled substances evidence; (2) store any collected Unwanted Medicine in a manner that prevents the diversion of Unwanted Medicine and consistent with the LEA's standard procedures for storing illicit controlled substances; and (3) transfer any collected Unwanted Medicine to a destruction location in a manner that prevents the diversion of Unwanted Medicine and is consistent with the LEA's standard procedures for transferring illicit controlled substances. If the LEA decides to transfer mail-back packages to a reverse distributor for destruction, the LEA must record the unique identification number for each mail-back package, the transfer date, and the name, address, and registration number of the reverse distributor. § 1317.35(e). The reverse distributor would comply with all applicable DEA requirements.

## VIII. Transporter and Disposal Facility Information

### A. Transporter of Unwanted Medicines from Kiosk Drop-Off Sites and Take-Back Events

- Name: **Burlington Environmental, LLC** (a wholly-owned subsidiary of Stericycle Environmental Solutions, Inc.) will be the transporter utilized to service all kiosk drop-off sites and take-back events and transport the Unwanted Medicine to a permitted hazardous waste incinerator.
- Address: 1629 East Alexander Ave, Tacoma, WA 98421
- Phone: 253-383-3044
- DOT ID Number: WAR000001743
- US DOT Number: 262568
- Permit Status: All relevant permits are active and in good standing. Available upon request.

### B. Disposal Facility for Unwanted Medicines from Kiosk Drop-Off Sites and Take-Back Events

- Name: **Veolia ES Technical Solutions**
- Address: Hwy 73, 3.5 miles West of Taylors Bayou; PO Box 2563 Port Arthur, TX 77640
- Phone: 409-736-2821
- Website: [www.veolia-ts.com](http://www.veolia-ts.com)
- Type: Permitted hazardous waste incinerator, EPA I.D. No. TXD000838896, Texas Permit Number 50212, WDW160, WDW358. This facility will be utilized to incinerate all Unwanted Medicines collected from kiosk drop-off sites and take-back events in the King County MED-Project Product Stewardship Program.

### C. Disposal Facilities for Unwanted Medicine from Mail-back Packages

- Name: **Stericycle, Inc., Indianapolis, Indiana Facility** (“Stericycle Facility”)
- Addresses: 2670 Executive Drive, Suite A, Indianapolis, IN 46241-9901
- Phone: 317-275-7530
- Website: [www.stericycleenvironmental.com](http://www.stericycleenvironmental.com)
- Type: DEA-compliant and registered collector facility. DEA Registration No.: RS0331607; RCRA Permit No: INR000110197. This facility will be utilized to render mail-back packages and the controlled substances therein non-retrievable.
  
- Name: **Covanta Indianapolis Inc., Indianapolis Resource Recovery Facility** (“Covanta Facility”)
- Address: 2320 S. Harding St., Indianapolis, IN 46221
- Phone Number: 317-634-7367
- Website: <http://www.covanta.com/facilities/facility-by-location/indianapolis.aspx>
- Type: Municipal Waste Combustor. Title V Air Permit No.: T097-5985-00123; Industrial Wastewater Discharge Permit No.: 495301; Solid Waste Permit No.: 49-13. This facility will be utilized to incinerate byproducts from the Stericycle Facility, including non-retrievable mail-back package materials.

BOH 11.50.080(B) provides that King County may approve the disposal of some or all unused, unwanted pharmaceutical products collected from King County residents at permitted large municipal waste combustors if disposal at permitted hazardous waste disposal facilities is “not feasible” based on “logistics or other considerations.” As King County has acknowledged, such permitted hazardous waste disposal facilities are not available to accept mail-back packages at this time. Thus, King County MED-Project is proposing a two-phase process using the Stericycle Facility and Covanta Facility to dispose of mail-back packages. Under this two-phase process, mail-back packages are accepted at the Stericycle Facility and rendered non-retrievable on-site. The non-retrievable mail-back package materials are then shipped for incineration to the Covanta Facility, a municipal waste combustor providing waste-to-energy incineration.

King County MED-Project’s request for King County approval to use this two-phase process for mail-back package disposal resulting in destruction at a municipal waste combustor was submitted on November 16, 2015 (provided as [Appendix I](#)).

## **IX. Unwanted Medicine Educational and Outreach Programming**

### **A. Overview**

The following communications plan includes a description of the public education and outreach efforts that King County MED-Project will undertake to educate King County residents about the collection and disposal of Unwanted Medicine from households.

### **B. Audiences**

To effectively educate the public about the Plan, King County MED-Project has developed a comprehensive communications campaign featuring both broad communications tactics (e.g., Public Service Announcements (“PSAs”), media advisories, etc.) as well as targeted outreach to audiences directly involved in the distribution and use of medicines to residents. These audiences include:

- General public
- Pharmacies, including education for dispensers of Unwanted Medicine
- Retailers of Unwanted Medicine
- Health care providers and their patients
- Veterinary providers and animal owners

This plan details program efforts to reach the varied cultural, language, geographic and age-range demographics, including through outreach to ethnic, community and alternate-language media ([Appendix J](#)); outreach to community organizations serving a broad range of audiences ([Appendix G](#)); availability of alternate language phone lines (section IX.D.1.); and availability of educational information through a broad range of channels, including toll free telephone lines, broadcast media, and the internet.

King County demographic information, including race/ethnicity, language, age, and geographic data, will continue to be analyzed in order to appropriately direct outreach and create educational materials to best serve the unique needs of each area. Efforts to ensure that materials are appropriately targeted, translated, and available to these populations will be pursued with associations, agencies, and organizations that can be viewed in [Appendix G](#).

## C. Messages

King County MED-Project messaging will focus on two main goals:

- Educating residents about the appropriate use, storage and disposal of Unwanted Medicine, and
- Providing residents with clear steps to properly manage the disposal of their Unwanted Medicine, including following instructions found on the medicine label, use of drop-off sites, participation in take-back events, and, where no disposal instructions are given on the drug labeling and a take-back program is not available, in-home disposal.

Key points of emphasis will include:

- The importance of taking medicines as prescribed by your health care provider;
- The importance of adhering to and completing your provider-prescribed therapy;
- The importance of properly and securely storing medicines;
- The importance of promptly and properly disposing of Unwanted Medicine;
- How to find and use kiosk drop-off sites;
- How to properly dispose of Unwanted Medicine; and
- Privacy issues (removing personally identifiable information from labeled prescription containers).

## D. Tools/Communications Channels

King County MED-Project will include a number of components designed to reach consumers and provide consistent access to timely and relevant information. Distribution of materials will include audiences such as law enforcement agencies, retail pharmacies, health care providers and systems, health associations, local government agencies, and other community organizations. Tools and communication channels will include:

### 1. Phone

King County MED-Project will include a toll-free telephone number [1-844-MED-Proj] for residents to obtain information about collection kiosks, educational materials and other aspects of the Plan for Unwanted Medicine from households.

- ✓ The King County MED-Project toll-free telephone line will initially support English and Spanish. The telephone line will also contain an option for callers to be transferred to a staffed call center.
- ✓ A recorded-line script at 1-844-MED-Proj will provide basic information about how the Plan works, where to obtain more information (e.g., the website), and will also include an option to talk with an operator to find a kiosk drop-off site or take-back event in the caller's ZIP code or local area.
- ✓ The recorded call script will include language directing callers with medical emergencies to call 911. Patients with medication-related questions will be directed to contact their health care provider(s).
- ✓ Please see [Appendix K](#) for a sample template of the recorded call script.

## 2. Website

Upon Plan approval, King County MED-Project will develop the King County website with capability for mobile devices as well. Information available to users includes locations of collection kiosks drop-off sites, educational materials, frequently asked questions and responses, public outreach events (e.g., take-back events), and results of the most recent survey of awareness of the Plan.

- ✓ The King County website will be accessible from King County MED-Project ([www.med-project.org](http://www.med-project.org)) and available for public access within 60 days of Plan approval. The Plan currently includes a sample mockup of the King County website and supporting pages from the landing page. [Appendix L](#) provides the proof of concept for each page.
- ✓ The King County website will also include access to the public relations toolkit in a downloadable format (see “Materials” section of this Plan, section IX.D.3. below) and contact information for residents. The toolkit available on the website includes a flyer/brochure ([Appendix M](#)), a public service announcement available in broadcast and audio versions, and a frequently asked questions (FAQ) document which will be reviewed and updated periodically. Translations of the brochure and FAQ will be available in Spanish, Vietnamese, Mandarin, Russian, and Tagalog.
- ✓ Community and government organizations and other public interest groups seeking materials to promote the program are encouraged to access these resources.

## 3. Materials

Educational materials about the program and on how to properly dispose of Unwanted Medicine will be available through the website, at take-back events, through potential third party partners, community organizations, LEA, local government and at kiosk drop-off sites. King County MED-Project’s approach will depend upon agreement and participation by third party partners and community organizations. King County MED-Project will also provide local governments with materials covering the proper disposal of Unwanted Medicine.

The Plan includes a sample educational brochure and a sample media advisory for promoting take-back events ([Appendix N](#)). Educational materials rely on plain language and explanatory images to promote consumer education and use of kiosk drop-off sites to residents with limited English proficiency.

## 4. Media Outreach

King County MED-Project will include public outreach, such as traditional and social media outreach, educational signage and community events. Specifically, King County MED-Project will promote the toolkit as well as take-back events using the available channels described in the Plan. Outreach efforts will encourage media outlets and third party groups to download and use the toolkit. King County MED-Project will coordinate outreach for scheduled take-back events to promote participation by residents. The following materials support the Unwanted Medicine educational and outreach programming for King County:

- ✓ Please see [Appendix K](#) for a sample education and outreach call script with the toolkit including flyers in [Appendix M](#) and website information included in [Appendix L](#). King County MED-Project’s approach will depend upon agreement and participation by community organizations.
- ✓ Please see [Appendix J](#) for a sample media list of key outlets that reach King County residents.
- ✓ Please see <http://www.kingcounty.gov/about/news/social-media.aspx> for sample digital- and hyper-local social media networks/outlets. Successful dissemination of information within these networks will be contingent upon their agreement to post or tweet the content provided.
- ✓ Please see [Appendix N](#) for a sample template media advisory announcing take-back events.

## E. Collaboration with the County Officials and Community Organizations

King County MED-Project will work in collaboration with the King County Board of Health as appropriate to build on existing community outreach resources, such as local organizations, media lists, available public media outlets, etc. Once the Plan is approved, the following activities will be initiated:

- *Briefing Materials Provided to Support Coordination with County Officials:*
  - ✓ King County MED-Project will provide access to Educational and Outreach Programming materials, including the sample brochure ([Appendix M](#)), to relevant County Departments and officials.
- *Outreach through Community Organizations:*
  - ✓ King County MED-Project will further promote the Plan in King County by engaging relevant stakeholders and community organizations. For example, King County MED-Project plans to arm community organizations, including those identified in [Appendix G](#), with the toolkit, including flyers and website information, included in [Appendix M](#). King County MED-Project's approach will depend upon agreement and participation by community organizations.

## F. Disclaimer

The written and verbal educational materials and public outreach tools required by the Regulations that are disseminated under this Product Stewardship Plan will include a disclaimer similar to the following: "The material has been provided for compliance with the King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the King County MED-Project or individual producers."

## X. Survey

After the first full year of operation of the Plan, King County MED-Project will conduct a survey to determine awareness of the Plan, the convenience of Unwanted Medicine collection options, and community awareness of the risks of abuse, poisonings, and overdoses from pharmaceutical products. The survey will be distributed to residents of King County, pharmacists and health care professionals who interact with members of the community.

Survey questions shall be designed to measure, at a minimum, (1) percent awareness of the Plan, (2) assess to what extent drop-off sites and other collection methods are convenient and easy to use, and (3) assess knowledge and attitudes about risks of abuse, poisonings and overdoses from prescription and nonprescription drugs in the home. As required by the Regulations, BOH 11.50.070 (A)(5), a draft of survey questions will be submitted to the Director for review and comment thirty days prior to distribution. Results of the survey will be reported to the Director and made public on the King County MED-Project website.

After the fifth and ninth years of Plan operation, King County MED-Project will conduct the survey again through outreach to the same constituencies.

## XI. Packaging

The Regulations require that a Plan consider "separating covered drugs from packaging to the extent possible to reduce transportation and disposal costs." BOH 11.50.050.H.2. The Regulations also require the Plan to consider "[r]ecycling of drug packaging to the extent feasible." BOH 11.50.050.H.3.

King County MED-Project has considered and evaluated options for the separation and recycling of drug packaging. Separating and recycling drug packaging collected under the Plan would require the management of separate waste streams at kiosk drop-off sites and take-back events: a waste stream for drug packaging and a waste stream for the drugs themselves.

While drug packaging is expected to constitute a significant amount of the waste incinerated under the Plan, King County MED-Project has concluded that separation of inner and/or outer packaging from Unwanted Medicine for recycling would raise three significant concerns:

1. Separating and recycling drug packaging could result in the disclosure of confidential patient information appearing on prescription drug packaging;
2. Separating and recycling drug packaging could increase the potential of releases and leakage of Unwanted Medicine; and
3. Separating and recycling drug packaging could increase diversion risks by adding additional steps to the collection process and because drug packaging is used in drug counterfeiting and would be a diversion target itself.

For these reasons, the King County MED-Project Plan does not provide for the separation and recycling of packaging from Unwanted Medicine.

## **XII. Compliance with Applicable Federal, State and Local Legal Requirements**

The Regulations require that a product stewardship plan describe how all entities participating in the Plan will “operate under” all applicable federal and state laws, rules and guidelines. BOH 11.50.050.D. As described in more detail below, the King County MED-Project Plan is designed such that all entities participating in the Plan shall comply with all applicable federal and state laws, rules and other legal requirements.

### **A. DEA Controlled Substances Act and Implementing Regulations**

On October 12, 2010, the United States Congress enacted the Secure and Responsible Drug Disposal Act of 2010 (“Disposal Act”) as amendments to the Controlled Substances Act (“CSA”). The Disposal Act amended the CSA to allow for the expansion of entities to which users can deliver pharmaceutical controlled substances for disposal, subject to regulations to be promulgated. On September 9, 2014, the DEA adopted a rule entitled “Disposal of Controlled Substances” (referred to herein as the “DEA Rule”) to implement the Disposal Act.

The DEA Rule provided that LEAs can continue to accept controlled substances for disposal. However, the DEA Rule also provides that pharmacies, reverse distributors, hospitals/clinics with on-site pharmacies, and certain other entities can register with the DEA as “collectors” and become authorized at their discretion on a voluntary basis, to accept controlled substances. The DEA Rule:

- Provides for the collection of controlled substances at kiosk drop-off sites at LEAs pharmacies and hospitals with on-site pharmacies;
- Provides for collection of controlled substances at take-back events;
- Provides for the use of mail-back programs to collect controlled substances;
- Allows for the commingling of controlled and non-controlled substances;
- Establishes detailed collection, recordkeeping, security, and other measures for all approved collection methods; and
- Provides that all collected pharmaceutical products be destroyed so that the products are rendered non-retrievable.

The King County MED-Project Product Stewardship Plan is designed such that all entities that are part of the Plan, including Vendor, are individually responsible to comply with their respective compliance obligations under the DEA Rule. Vendor will ensure that the transportation of Unwanted Medicines, including controlled substances, collected from kiosk drop-off sites and take-back events complies with all DEA requirements, including those in § 1317.

### **B. Washington State Pharmacy Quality Assurance Commission (WSPQAC)**

The Regulations require that a Plan describe “how any pharmacy collection site will operate under applicable rules and guidelines of the State of Washington Board of Pharmacy.” BOH 11.50.050.D. As of the time this Plan was submitted, WSPQAC has decided to review Plans that have already been approved by King County, in order to give their final approval to such Product Stewardship Organizations. King County MED-Project will thus present the Plan, upon approval by King County, to the WSPQAC for review and approval.

### **C. State of Washington Waste Management Program**

Entities participating in the King County MED-Project Product Stewardship Program shall comply with any applicable provisions of the State of Washington’s waste management program including applicable “moderate-risk” waste and product take-back center requirements.

### **D. United States Department of Transportation (USDOT)**

When transporting Unwanted Medicine, Vendor will ensure compliance with all USDOT Hazardous Materials Regulations (HMR). Vendor anticipates that the Unwanted Medicine will generally be identified with the identification number and shipping name UN 3248 Medicine, Liquid, Flammable, Toxic, N.O.S. 3 (6.1) PG II ERG (131). Shipments of Unwanted Medicine will comply with applicable shipping papers, packaging, placarding and other HMR requirements associated with shipment by ground.

### **XIII. Annual Report**

An annual report will be provided to King County within six months after the end of the first twelve-month period of operation and annually thereafter within six months after the end of each subsequent twelve-month period. BOH 11.50.070.4 and BOH 11.50.100. The annual report will comply with the Regulations and will include:

- A list of Producers participating in the Plan;
- The total amount, by weight, of Unwanted Medicine collected, including the amount by weight from each collection method used (kiosk drop-off sites, take-back events, and mail-back services);
- A list of kiosk drop-off sites;
- The number of mail-back packages provided and the zip codes where provided;
- The dates and locations of take-back events held;
- Transporters and disposal facilities used;
- A statement whether any safety or security problems occurred during collection, transportation, or disposal of Unwanted Medicine and, if so, what changes have or will be made to alleviate these problems and improve safety and security;
- A description of public education, outreach, and evaluation activities implemented, including the capture of survey results from residents, pharmacies, law enforcement agencies, and media outlets in order to analyze statistics related to awareness, participation, understanding, and satisfaction related to the program and evaluate results for future possible changes to the program activities;
- A summary of the Product Stewardship Plan's goals, the degree of success meeting these goals in the past year, and how these goals will be achieved in the next year if they were not met; and
- The Plan's total expenditures.

# Appendix A

## King County MED-Project Participants

The Pharmaceutical Product Stewardship Working Group (“PPSWG”), a group of pharmaceutical Producers, has established a limited liability company, King County MED-Project LLC, as the Stewardship Organization for the Plan. The Participants in King County MED-Project are provided to the County on an on-going basis. The list of participants was last submitted to King County on December 11, 2015.

## Appendix B

### King County MED-Project Kiosk Drop-off Sites with Expressions of Interest

King County MED-Project will provide King County the list of participating kiosk drop-off sites on an on-going basis.

Below is a list of locations that have expressed interest in participating as a kiosk drop-off site. The pharmacy responses below reflect information provided by the pharmacists surveyed as of December 11, 2015.

Name	Street Address	City	State	Zip Code	Phone	Contact	Email
Algona Police Department	402 Warde Street	Algona	WA	98101	(253) 833-2743	Sgt James Schrimpsner	<a href="mailto:james@algonawa.gov">james@algonawa.gov</a>
A & H Drug Stores	730 12th St SE	Auburn	WA	98002	(253) 520-0333	Charlie Sizemore	<a href="mailto:charlie@ahstores.com">charlie@ahstores.com</a>
Fred Meyer	801 Auburn Way N # F	Auburn	WA	98002	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Genoa Healthcare, Central Pharmacy	4508 Auburn Way N, Suite A-104	Auburn	WA	98002	(253) 2180844	Stephanie Kornechuk	<a href="mailto:SKornechuk@genoahealthcare.com">SKornechuk@genoahealthcare.com</a>
Genoa Healthcare, Valley Cities Counseling & Consultation							
HealthPoint at Valley Cities Auburn	2704 I St NE	Auburn	WA	98002	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
HealthPoint Auburn	126 Auburn Avenue, Suite 300	Auburn	WA	98002	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
Muckleshoot Health Wellness Center	17500 SE 392nd St	Auburn	WA	98092	(253) 9396648	Tim Frostad	<a href="mailto:timothy.frostad@muckleshoothealth.com">timothy.frostad@muckleshoothealth.com</a>
Bellevue Police Department	3915 Factoria Blvd SE	Bellevue	WA	98092	(425) 452-6045	Lt Travis Forbush	
Bellevue Police Department	1336 156th Ave NE	Bellevue	WA	98006	(425) 452-6045	Lt Travis Forbush	
Bellevue Police Department	450 110th Ave NE	Bellevue	WA	98007	(425) 452-6045	Lt Travis Forbush	
Fred Meyer	2041 148th Ave NE	Bellevue	WA	98007	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Pharmacy Plus	1299 156th Ave NE # 140	Bellevue	WA	98007	(425) 644-8887	Boris Povsner	<a href="mailto:pharmacyplus.healthmart@gmail.com">pharmacyplus.healthmart@gmail.com</a>
QFC	2636 Bellevue Way NE	Bellevue	WA	98004	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	3550 Factoria Blvd SE	Bellevue	WA	98006	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	1510 145th Pl SE # A	Bellevue	WA	98007	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
Black Diamond Police Department	25510 Lawson St	Black Diamond	WA	98009	(253) 631-1012	Chief Kiblinger	
Bothell Police Department	18410 101st Ave NE	Bothell	WA	98010	(425) 486-1254	Deputy Chief Henry Simon	<a href="mailto:henny.simon@bothellwa.gov">henny.simon@bothellwa.gov</a>
HealthPoint Bothell	10414 Beardslee Blvd Suite 100	Bothell	WA	98011	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
QFC	18921 Bothell Way NE	Bothell	WA	98011	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
Burien Police Department	14905 6th Ave SW	Burien	WA	98011	(206) 477-2200	Henry Mclauchlan	<a href="mailto:henny.mclauchlan@kingcounty.gov">henny.mclauchlan@kingcounty.gov</a>
CVS Caremark	117 SW 160th Street	Burien	WA	98166	(206) 242-2030	Sarah Ashcraft	
Fred Meyer	14300 1st Ave S	Burien	WA	98168	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>

Genoa Healthcare, Navos Mental Health Solutions	1210 SW 136th St, Room 101	Burien	WA	98166	(253) 2180844	Stephanie Kornechuk	<a href="mailto:SKornechuk@genoahealthcare.com">SKornechuk@genoahealthcare.com</a>
Clyde Hill Police Department	9605 NE 24th Street	Clyde Hill	WA	98004	(425) 454-7187	Chief Bill Archer	<a href="mailto:bill@clydehill.org">bill@clydehill.org</a>
Covington Police Department	16720 SE 271st, Suite 100	Covington	WA	98004	(253) 480-2400	Chief Andrew McCurdy	<a href="mailto:andrew.mccurdy@kingcounty.gov">andrew.mccurdy@kingcounty.gov</a>
Fred Meyer	16735 SE 272nd St	Covington	WA	98042	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
HealthPoint Midway	26401 Pacific Highway South	Des Moines	WA	98198	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointhc.org">ksinay@healthpointhc.org</a>
Duvall Police Department	26225 NE Stephens St	Duvall	WA	98019	(425) 788-1519	Margo Guzman	<a href="mailto:margo.guzman@duvall.wa.gov">margo.guzman@duvall.wa.gov</a>
Duvall Family Drugs	15602 Main Street Northeast	Duvall	WA	98019	(425) 788-2644	Carrie Vanderhowen	
Jim's Pharmacy	2820 Griffin Ave # 102	Enumclaw	WA	98022	(360) 825-6523	Victor	
QFC	1009 Monroe Ave	Enumclaw	WA	98022	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
Federal Way Police Department	33325 8th Avenue S	Federal Way	WA	98003	(253) 835-6700	Cathy Schrock	<a href="mailto:cathy.schrock@cityoffederalway.com">cathy.schrock@cityoffederalway.com</a>
Fred Meyer	33702 21st Ave SW	Federal Way	WA	98023	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
HealthPoint Federal Way	33431 13th Place S	Federal Way	WA	98003	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointhc.org">ksinay@healthpointhc.org</a>
Virginia Mason Federal Way Medical Center	33501 1st Way S	Federal Way	WA	98003	(253) 838-2400	Eileen Bautista	<a href="mailto:Eileen.Bautista@virginiamason.org">Eileen.Bautista@virginiamason.org</a>
Fred Meyer	6100 E Lake Sammamish SE # F	Issaquah	WA	98029	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Issaquah Police Department	130 E Sunset Way	Issaquah	WA	98003	(425) 837-3200	Bob Porter	<a href="mailto:bobp@issaquah.gov">bobp@issaquah.gov</a>
QFC	1540 NW Gilman Blvd	Issaquah	WA	98027	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	4570 Klahanie Dr SE	Issaquah	WA	98029	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
Kenmore Police Department	1812068th Ave NE	Kenmore	WA	98028	(425) 398-8900	Chief Cliff Sether	<a href="mailto:Clifford.Sether@kingcounty.gov">Clifford.Sether@kingcounty.gov</a>
Ostroms Drug & Gift	6414 NE Bothell Way	Kenmore	WA	98028	(425) 486-7711	Bill Briggs	<a href="mailto:bill@ostroms.com">bill@ostroms.com</a>
A & H Drug Store	23826 104th Ave SE	Kent	WA	98031	(253) 520-0333	Charlie Sizemore	<a href="mailto:charlie@ahstores.com">charlie@ahstores.com</a>
A & H Stores Inc	25022 104th Ave SE # E	Kent	WA	98030	(253) 520-0333	Charlie Sizemore	<a href="mailto:charlie@ahstores.com">charlie@ahstores.com</a>
Fred Meyer	10201 SE 240th St	Kent	WA	98031	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Fred Meyer	25250 Pacific Hwy S # 1	Kent	WA	98032	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
HealthPoint at Valley Cities Kent	325 West Gowe Street	Kent	WA	98032	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointhc.org">ksinay@healthpointhc.org</a>

HealthPoint Kent	403 East Meeker Street Suite 200	Kent	WA	98030	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
Kent Police Department	232 4th Ave S	Kent	WA	98028	(253) 856-5800	Stacy Judd	<a href="mailto:sjudd@kentwa.gov">sjudd@kentwa.gov</a>
Fred Meyer	12221 120th Ave NE	Kirkland	WA	98034	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Kirkland Police Department	123 5th Ave	Kirkland	WA	98030	(425) 587-3400	Lt. Siebert	<a href="mailto:nsiebert@kirklandwa.gov">nsiebert@kirklandwa.gov</a>
Pacific Medical Centers	12910 Totem Lk Blvd NE Suite 101	Kirkland	WA	98034	(425) 814-5003	Kim Johnson	
QFC	211 Parkplace Center	Kirkland	WA	98033	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@gfc.com">chuck.paulson@gfc.com</a>
QFC	11224 NE 124th St	Kirkland	WA	98034	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@gfc.com">chuck.paulson@gfc.com</a>
Lake Forest Park Police	17425 Ballinger Way NE	Lake Forest	WA	98155	(425) 754-0908	Jonelle Fenton-Wallace	<a href="mailto:jfw@snoco.org">jfw@snoco.org</a>
Fred Meyer	26520 Mpl Vly Bick Dmnd Rd SE	Maple Valley	WA	98038	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Maple Valley Police Department	22017 SE Wax Road, Suite 100	Maple Valley	WA	98155	(425) 413-5158	Scott Behrbaum	<a href="mailto:ScottB@issaquahwa.gov">ScottB@issaquahwa.gov</a>
Mercer Police Department	9611 SE 36th Street	Mercer Island	WA	98040	(206) 236-3500	Leslie Burns	<a href="mailto:Leslie.Burns@mercergov.org">Leslie.Burns@mercergov.org</a>
Newcastle Police Department	12835 Newcastle Way, Suite 200	Newcastle	WA	98056	(425) 649-4444	Chief Melinda Irvine	<a href="mailto:melinda.irvine@kingcounty.gov">melinda.irvine@kingcounty.gov</a>
Access Pharmacy	17833 1st Ave S	Normandy Park	WA	98148	(206) 246-0040	Neil Sewpersad	
Normandy Park Police Department	801 SW 174th St	Normandy Park	WA	98166	(206) 248-7600	Jean Lindsey	<a href="mailto:jeanl@ci.normandy-park.wa.us">jeanl@ci.normandy-park.wa.us</a>
North Bend Police Department	1550 Boalch Ave NW	North Bend	WA	98166	(425) 888-3333	Dienna Mihelich	<a href="mailto:dienna.d.mihelich@ci.snoqualmie.wa.us">dienna.d.mihelich@ci.snoqualmie.wa.us</a>
QFC	460 E North Bend Way	North Bend	WA	98045	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@gfc.com">chuck.paulson@gfc.com</a>
Fred Meyer	17667 NE 76th St	Redmond	WA	98052	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
HealthPoint Redmond	16225 NE 87th Street	Redmond	WA	98052	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
QFC	8867 161st Ave NE	Redmond	WA	98052	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@gfc.com">chuck.paulson@gfc.com</a>
QFC	23475 NE Novelty Hill Rd	Redmond	WA	98053	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@gfc.com">chuck.paulson@gfc.com</a>
A & H Drug Store	2820 NE Sunset Blvd	Renton	WA	98056	(253) 520-0333	Charlie Sizemore	<a href="mailto:charlie@ahstores.com">charlie@ahstores.com</a>
Fred Meyer	365 Renton Center Way SW # G	Renton	WA	98057	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Fred Meyer	17801 108th Ave SE #A	Renton	WA	98055	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
HealthPoint Renton	200 South 2nd Street	Renton	WA	98057	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
Pacific Medical Centers	601 S Carr Road Suite 100	Renton	WA	98055	(425) 227-3122	Allien Nguyen	

Renton Police Department	1055 S Grady Way	Renton	WA	98057	(206) 755-9928	Sgt Craig Sjolin	<a href="mailto:csjolin@rentonwa.gov">csjolin@rentonwa.gov</a>
Sammamish Police Department	801 228th Ave SE	Sammamish	WA	98178	(425) 836-5674	Stacey O'Brien	
HealthPoint SeaTac	4040 South 188th Street Suite 201	SeaTac	WA	98188	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
HealthPoint Tyee Campus	4424 S 188th St Bldg 900	SeaTac	WA	98188	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
A & H Drug Store	12616 Renton Ave S	Seattle	WA	98178	(253) 520-0333	Charlie Sizemore	<a href="mailto:charlie@ahstores.com">charlie@ahstores.com</a>
AHF Pharmacy	1016 E Pike #100	Seattle	WA	98122	(206) 568-2486	Shawn	<a href="http://Shawn@ahfpharmacy.org">Shawn@ahfpharmacy.org</a>
Ballard Plaza Pharmacy	1801 NW Market Street #104	Seattle	WA	98107	(206) 782-6354		
Cherry Street Pharmacy	1120 Cherry St # 200	Seattle	WA	98104	(855) 894-6337	Brad Mott	<a href="mailto:brad.mott@aids.org">brad.mott@aids.org</a>
Eastern's Pharmacy	515 Minor Ave # 120	Seattle	WA	98104	(206) 622-6094	Khaled Abdelrazzak	<a href="mailto:alexandriadrugs@gmail.com">alexandriadrugs@gmail.com</a>
Fred Meyer	915 NW 45th St	Seattle	WA	98107	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Fred Meyer	100 NW 85th St	Seattle	WA	98117	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Fred Meyer	13000 Lake City Way NE	Seattle	WA	98125	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
Genoa Healthcare, Sound Mental Health	1600 E Olive St #D	Seattle	WA	98122	(253) 2180844	Stephanie Kornechuk	<a href="mailto:SKornechuk@genoahealthcare.com">SKornechuk@genoahealthcare.com</a>
Katterman's Sand Point United	5400 Sand Point Way NE	Seattle	WA	98105	(206) 524-2211	Beverly Shaeffer	
Kelley-Ross Pharmacy	2324 Eastlake Ave E Suite #400	Seattle	WA	98102	(206) 622-3565	Ryan Oftebro	<a href="mailto:roftebro@krph.com">roftebro@krph.com</a>
Kelley-Ross Pharmacy	805 Madison Street #702	Seattle	WA	98104	(206) 622-3565	Ryan Oftebro	<a href="mailto:roftebro@krph.com">roftebro@krph.com</a>
Kelley-Ross Pharmacy	904 7th Avenue Suite 103	Seattle	WA	98104	(206) 622-3565	Ryan Oftebro	<a href="mailto:roftebro@krph.com">roftebro@krph.com</a>
Luke's Pharmacy	611 Maynard Ave S	Seattle	WA	98104	(206) 621-8883	Sam Chan	<a href="mailto:cuhk@aol.com">cuhk@aol.com</a>
Northwest Prescriptions UW Medicine	1536 N 115th St # 100	Seattle	WA	98133	(206) 3652277	Ryan Burfeind	<a href="mailto:rburfeind@nwprescriptions.com">rburfeind@nwprescriptions.com</a>
NW Prescriptions	10330 Meridian Ave N # 180	Seattle	WA	98133	(206) 3686060	Ryan Burfeind	<a href="mailto:rburfeind@nwprescriptions.com">rburfeind@nwprescriptions.com</a>
Pacific Medical Centers	10416 5th Avenue NE	Seattle	WA	98125	(206) 517-6635	Nancy Lee	
Pacific Medical Centers	1101 Madison Street #306	Seattle	WA	98104	(206) 505-1397	Eugene Cho	
Pacific Medical Centers	1200 12th Avenue S	Seattle	WA	98144	(206) 621-4109	Nancy Kerlee	
Pharmaca Integrative Pharmacy	1815 N 45th St # 110	Seattle	WA	98103	(206) 547-1208	Devin Finko	<a href="mailto:dfinko@pharmaca.com">dfinko@pharmaca.com</a>

QFC	417 Broadway E	Seattle	WA	98102	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	2746 NE 45th St # 2	Seattle	WA	98105	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	500 Mercer St	Seattle	WA	98109	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	4550 42nd Ave SW	Seattle	WA	98116	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	9999 Holman Rd NW	Seattle	WA	98117	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	1600 W Dravus St	Seattle	WA	98119	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	11100 Roosevelt Way NE	Seattle	WA	98125	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
Rxtra Care	7317 35th Ave NE	Seattle	WA	98115	(206) 417-8066	Holly Henry	<a href="mailto:holly@rxtracare.com">holly@rxtracare.com</a>
Virginia Mason Hospital & Seattle Medical Center Buck Pavilion	1201 Terry Ave	Seattle	WA	98101	(206) 625-7202	Hung Troung	<a href="mailto:hung.truong@vmmc.org">hung.truong@vmmc.org</a>
Virginia Mason Lindeman Pavilion Pharmacy	1100 9th Ave	Seattle	WA	98104	(206) 223-6600	Hung Troung	<a href="mailto:hung.truong@vmmc.org">hung.truong@vmmc.org</a>
Walgreens	5409 15th Ave NW	Seattle	WA	98107	(206) 781-0056	Klean Dayani	<a href="mailto:Dara.Dayani@walgreens.com">Dara.Dayani@walgreens.com</a>
HealthPoint Evergreen Campus	830 SW 116th Street	Seattle	WA	98146	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
UW Medicine	1959 Pacific St	Seattle	WA	98195	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine	401 Broadway Ave	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine	206 3rd Ave S	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine	908 Jefferson St	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine	925 Eastlake E	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine	4245 Roosevelt Way NE	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine Madison Clinic	325 Ninth Ave, 2nd Floor, West Clinic	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine Ground East Hospital	325 Ninth Ave, East Clinic	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
UW Medicine Harborview Clinic	325 Ninth Ave, 2nd Floor, West Clinic	Seattle	WA	98104	(206) 5984411	Shakeel Bandali	<a href="mailto:shakeelb@u.washington.edu">shakeelb@u.washington.edu</a>
Fred Meyer	18325 Aurora Ave N	Shoreline	WA	98133	(503) 2328844	Melissa Hansen	<a href="mailto:Melissa.Hansen@fredmeyer.com">Melissa.Hansen@fredmeyer.com</a>
QFC	14501 1st Ave NE	Shoreline	WA	98155	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
QFC	600 NW Richmond Beach Rd	Shoreline	WA	98177	(425) 990-5641	Chuck Paulson	<a href="mailto:chuck.paulson@qfc.com">chuck.paulson@qfc.com</a>
HealthPoint Tukwila	13030 Military Rd S	Tukwila	WA	98168	(253) 569-3302	Keith Sinay	<a href="mailto:ksinay@healthpointinc.org">ksinay@healthpointinc.org</a>
Vashon Pharmacy	17617 Vashon Hwy SW	Vashon	WA	98070	(206) 463-9118	Myra Willingham	<a href="mailto:vashonpharmacy@msn.com">vashonpharmacy@msn.com</a>
Bellegrove Pharmacy	1200 112th Ave NE #A100	Woodinville	WA	98004	(425) 908-7363	Steve Singer	
Haggen Pharmacy	17641 Garden Way NE	Woodinville	WA	98072	(360) 6508210	Mike Arndorfer	<a href="mailto:marndorfer@haggen.com">marndorfer@haggen.com</a>

## Appendix C

### King County List of Possible Additional Kiosk Drop-Off Sites

Name	Street Address	City	State	Zip Code
Safeway	101 Auburn Way S	Auburn	WA	98002
Safeway	300 Bellevue Way NE	Bellevue	WA	98004
Safeway	1645 140th Ave NE	Bellevue	WA	98005
Safeway	138 SW 148th St	Burien	WA	98166
Costco	27520 Covington Way SE	Covington	WA	98042
Safeway	17023 SE 272nd St	Covington	WA	98042
Safeway	21401 International Blvd	Des Moines	WA	98198
Safeway	14020 Main St NE	Duvall	WA	98019
Jim's Pharmacy	3021 Griffin Ave	Enumclaw	WA	98022
Safeway	152 Roosevelt Ave	Enumclaw	WA	98022
Costco	35100 Enchanted Parkway S	Federal Way	WA	98003
Safeway	1207 S 320th St	Federal Way	WA	98003
Costco	1801 10th Ave NW	Issaquah	WA	98027
Safeway	735 NW Gilman Blvd	Issaquah	WA	98027
Safeway	6850 NE Bothell Way # Main	Kenmore	WA	98028
Safeway	13101 SE Kent Kangley Rd	Kent	WA	98030
Safeway	20830 108th Ave SE	Kent	WA	98031
Safeway	210 Washington Ave S	Kent	WA	98032
Assured Pharmacy Inc	12071 124th Ave NE	Kirkland	WA	98034
Costco	8629 120th Ave NE	Kirkland	WA	98033
Safeway	12519 NE 85th St	Kirkland	WA	98033
Safeway	10020 NE 137th St	Kirkland	WA	98034
Safeway	14444 124th Ave NE	Kirkland	WA	98034
Safeway	26916 Maple Valley Hwy	Maple Valley	WA	98038
Medina Police Department	501 Evergreen Point Road	Medina	WA	98038
Safeway	900 Meridian E Suite 23	Milton	WA	98354
Safeway	6911 Coal Creek Parkway SE	Newcastle	WA	98059
Safeway	460 SW Mt Si Blvd	North Bend	WA	98045
Pacific Police Department	133 3rd Ave SE	Pacific	WA	98045
Safeway	200 S 3rd St	Renton	WA	98057
Safeway	4300 NE 4th St	Renton	WA	98059
King County Sheriffs - SeaTac Station	4800 South 188th St.	SeaTac	WA	98188
Safeway	630 228th Ave NE	Sammamish	WA	98074
Safeway	4011 S 164th St	SeaTac	WA	98188
Costco	4401 4th Ave S	Seattle	WA	98134
Safeway	8704 Greenwood Ave N	Seattle	WA	98103
Safeway	3020 NE 45th St	Seattle	WA	98105
Safeway	1423 NW Market St	Seattle	WA	98107
Safeway	2100 Queen Anne Ave N	Seattle	WA	98109
Safeway	1410 E John St	Seattle	WA	98112

## Appendix C *Continued*

### King County List of Possible Additional Kiosk Drop-Off Sites

Safeway	2201 E Madison St	Seattle	WA	98112
Safeway	7300 Roosevelt Way NE	Seattle	WA	98115
Safeway	7300 Roosevelt Way NE	Seattle	WA	98115
Safeway	2622 California Ave SW	Seattle	WA	98116
Safeway	8340 15th Ave NW	Seattle	WA	98117
Safeway	3820 Rainier Ave S	Seattle	WA	98118
Safeway	9262 Rainier Ave S	Seattle	WA	98118
Safeway	516 1st Ave W	Seattle	WA	98119
Safeway	12318 15th Ave NE	Seattle	WA	98125
Safeway	9620 28th Ave SW	Seattle	WA	98126
Costco	1175 N 205th St	Shoreline	WA	98133
Safeway	15332 Aurora Ave N	Shoreline	WA	98133
Safeway	17202 15th Ave NE	Shoreline	WA	98155
Costco	400 Costco Drive, Suite 150	Tukwila	WA	98188
Safeway	19150 NE Woodinville Duvall Rd # A1	Woodinville	WA	98077
Walgreens	1416 Harvey Rd	Auburn	WA	98002
Walgreens	1701 Auburn Way S	Auburn	WA	98002
Walgreens	2353 130th Ave NE # 100	Bellevue	WA	98005
Walgreens	647 140th Ave NE	Bellevue	WA	98005
Walgreens	14656 Ambaum Blvd SW	Burien	WA	98166
Walgreens	27130 172nd Ave SE	Covington	WA	98042
Walgreens	23003 Pacific Hwy S	Des Moines	WA	98198
Walgreens	1350 Garrett St	Enumclaw	WA	98022
Walgreens	28817 Military Rd S	Federal Way	WA	98003
Walgreens	34008 Hoyt Rd SW	Federal Way	WA	98023
Walgreens	6300 E Lake Sammamish Pkwy SE	Issaquah	WA	98029
Walgreens	25605 104th Ave SE	Kent	WA	98030
Walgreens	27112 132nd Ave SE	Kent	WA	98042
Walgreens	12405 NE 85th St	Kirkland	WA	98033
Walgreens	11607 98th Ave NE	Kirkland	WA	98034
Walgreens	7707 SE 27th St # 100	Mercer Island	WA	98040
Walgreens	3011 NE Sunset Blvd	Renton	WA	98056
Walgreens	275 Rainier Ave S	Renton	WA	98057
Walgreens	4105 NE 4th St	Renton	WA	98059
Seattle Police Department East	1519 12th Ave	Seattle	WA	98112
Seattle Police Department Headquarters	610 Fifth Ave	Seattle	WA	98122
Seattle Police Department North	10049 College Way N	Seattle	WA	98124
Seattle Police Department South	3001 S Myrtle St	Seattle	WA	98106
Seattle Police Department SouthWest	2300 SW Webster St	Seattle	WA	98101
Seattle Police Department West	810 Virginia St	Seattle	WA	98188

## Appendix C *Continued*

### King County List of Possible Additional Kiosk Drop-Off Sites

SeattleMeds Pharmacy	1305 Madison St	Seattle	WA	98104
Walgreens	222 Pike St	Seattle	WA	98101
Walgreens	8701 Greenwood Ave N	Seattle	WA	98103
Walgreens	1205 NE 50th St	Seattle	WA	98105
Walgreens	9456 16th Ave SW	Seattle	WA	98106
Walgreens	566 Denny Way	Seattle	WA	98109
Walgreens	500 15th Ave E	Seattle	WA	98112
Walgreens	8500 15th Ave NW # A	Seattle	WA	98117
Walgreens	4412 Rainier Ave S	Seattle	WA	98118
Walgreens	1531 Broadway	Seattle	WA	98122
Walgreens	14352 Lake City Way NE	Seattle	WA	98125
Walgreens	859 NE Northgate Way	Seattle	WA	98125
Walgreens	6330 35th Ave SW	Seattle	WA	98126
Walgreens	2400 S Jackson St	Seattle	WA	98144
Walgreens	17524 Aurora Ave N	Shoreline	WA	98133
Walgreens	17518 15th Ave NE	Shoreline	WA	98155
Snoqualmie Police Department	34825 SE Douglas St	Snoqualmie	WA	98065
Tukwila Police Department	6200 Southcenter Blvd	Tukwila	WA	98065
Walgreens	3716 S 144th St	Tukwila	WA	98168
Walgreens	17520 Avondale Rd NE	Woodinville	WA	98077
Woodinville Police Department	17301 133rd Ave NE	Woodinville	WA	98070

# Appendix D

## Template Agreement

### TEMPLATE AGREEMENT: KIOSK DROP-OFF SITE SERVICES

This Kiosk Services Agreement, including as amended, supplemented or otherwise modified from time to time (the "Agreement") is entered into by between the King County MED-Project LLC ("MED-Project") and [NAME OF DROP-OFF SITE HOST] ("SHORTER NAME]" or "Host") (each individually, a "Party," collectively the "Parties").

#### Introductory Statement

King County, Washington approved the King County Board of Health Secure Medicine Return Regulations for the disposal of household pharmaceutical products in 2013 (the "Regulations"). Subsequent to approval of the Regulations, the MED-Project Product Stewardship Plan, which, among other things, provides for the use of kiosks at drop-off sites to collect Unwanted Medicine (defined below) from King County households, was reviewed and approved by King County.

NOW, THEREFORE, in consideration of the mutual promises and covenants set forth herein and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

**1. Definitions.** The following terms shall have the respective meanings set forth below:

- 1.1. "Applicable Laws" shall mean all applicable federal, state, county, and local laws, statutes, ordinances, codes, rules, regulations, orders, decrees, guidance or pronouncements of any governmental, administrative or judicial authorities including, but not limited to, the King County Board of Health Secure Medicine Return Regulations §§ 11.50.010 through 11.50.160 (2013), federal Controlled Substances Act, 21 U.S.C. §§ 801 et seq., U. S. Drug Enforcement Administration controlled substances disposal regulations, 21 C.F.R. §§ 1300 et seq., and any amendments or modifications to these legal requirements.
- 1.2. "DEA" shall mean the U.S. Drug Enforcement Administration.
- 1.3. "Effective Date" shall mean the date defined in Section 21 of this Agreement.

- 1.1. "Emergency Requests" shall mean requests for Services in Section 3.2 of this Agreement in response to any events, situations, activities or circumstances that pose a risk or potential risk of harm or injury to property or persons.
- 1.2. "Kiosks" shall mean DEA-compliant receptacles: (i) used for the collection of Unwanted Medicine (as defined below); (ii) identified in Exhibit A of this Agreement; and (iii) provided by MED-Project or, if the Host is a law enforcement agency, provided by the Host.
- 1.3. "Losses" shall mean any costs, expenses, damages or diminution of value.
- 1.4. "Manager" shall mean [HOST TO INSERT CONTACT]
- 1.5. "Plan" shall mean the MED-Project Product Stewardship Plan.
- 1.6. "Services" shall mean the obligations identified in Section 3.2 of this Agreement.
- 1.7. "Service Technician" shall mean the employees designated by Vendor to perform the obligations of Service Technicians in the Standard Operating Procedures, provided as Exhibit B.
- 1.8. "Termination Date" shall mean the date this agreement terminates pursuant to Sections 8.1.1 through 8.1.5 of this Agreement.
- 1.9. "Vendor" shall mean the qualified vendor contracted by MED-Project and identified further in Exhibit C, including any vendor substituted by MED-Project for the initial Vendor.
- 1.10. "Unwanted Medicine" shall have the same meaning as "Unwanted Medicine" under Section VI of the Plan.

**1. Representations and Warranties.**

- 1.1. Host hereby represents and warrants as follows:
  - 1.1.1. Host possesses all required permits, licenses and qualifications required under Applicable Laws (i) to collect, handle, process and dispose of Unwanted Medicine pursuant to the terms of this Agreement, and (ii) to collect Unwanted Medicine in such manner as may be required by Applicable Laws and the terms of this Agreement. Host is currently, and shall remain, in compliance with all such permits, licenses and qualifications.

# Appendix D *Continued*

## Template Agreement

- 1.1.1. Host possesses all required authorizations to enter into this Agreement and this Agreement has been duly authorized and executed by Host in compliance with all required authorizations.
- 1.1.2. Host's execution, delivery, and performance of this Agreement does not, and will not, conflict with any agreement, instrument or understanding to which Host is a party or by which it may be bound.
- 1.1. MED-Project hereby represents and warrants for itself, and to the extent applicable, with respect to Vendor, as follows:
  - 1.1.1. Vendor possesses all required permits, licenses and qualifications required under Applicable Laws to collect, handle, process and dispose of Unwanted Medicine. Vendor is currently, and shall remain, in compliance with all such permits, licenses and qualifications.
  - 1.1.2. MED-Project possesses all required authorizations and corporate authority to enter into this Agreement and this Agreement has been duly authorized and executed by MED-Project in compliance with all required corporate authorizations.
  - 1.1.3. MED-Project's execution, delivery, and performance of this Agreement does not, and will not, conflict with any agreement, instrument or understanding to which MED-Project is a party or by which it may be bound.
- 1. Services.**
  - 1.1. Host, Vendor, and MED-Project shall perform all obligations required of them under this Agreement in compliance with Applicable Laws.
  - 1.2. MED-Project, through the Vendor, shall:
    - 1.2.1. If the Manager requests a Kiosk from MED-Project, and MED-Project approves the Kiosk request, within 120 days of the request deliver a Kiosk to Host at a time mutually agreed to by the Parties and when the Manager is present;
    - 1.2.2. Assist Host with installation of the Kiosk if: (1) requested to do so by the Manager; (2) [HOST COLLECTION SITE] provides adequate space for installation of the Kiosk; and (3) the Manager is present at the [HOST COLLECTION SITE] at the time of Kiosk installation.
- 1.1.1. Review and inspect the Kiosk when Vendor collects Unwanted Medicine from the Kiosk;
- 1.1.2. Perform maintenance of the Kiosk if requested by the Manager or deemed necessary by Vendor or MED-Project;
- 1.1.3. Remove any Kiosk(s) from the [HOST COLLECTION SITE] if the Manager requests a Kiosk from MED-Project, MED-Project approves the Kiosk request, and a replacement Kiosk is scheduled for delivery;
- 1.1.4. Remove Kiosk(s) from [HOST COLLECTION SITE] if this Agreement terminates pursuant to Section 8 of this Agreement;
- 1.1.5. Supply each Kiosk with a liner meeting all Applicable Laws, including, but not limited to, 21 U.S.C. §§ 801 et seq.;
- 1.1.6. Provide Host with a regular schedule for the collection of Unwanted Medicine from Kiosks and notify the Manager in advance of any changes to this schedule;
- 1.1.7. Collect Unwanted Medicine in accordance with the schedule identified in Section 3.2.8 of this Agreement or upon request by the Manager and approval by MED-Project;
- 1.1.8. Conduct collection under Section 3.2.9 of this Agreement in accordance with the Standard Operating Procedures provided in Exhibit B;
- 1.1.9. Respond to Emergency Requests from Host;
- 1.1.10. Transport and dispose of Unwanted Medicine collected from Kiosks in accordance with all Applicable Laws and the Plan.
- 1.1. Vendor shall be solely responsible for providing all such Services in Section 3.2. Host agrees to look solely to Vendor for such Services. MED-Project shall have the right on 30 days' prior notice to the Manager to change the Vendor. In such a case, the new entity that becomes the Vendor will be responsible under this Agreement for Services required of Vendor from and after the date of such change.
- 1.2. Host shall allow MED-Project, through its Vendor, to provide the Services in Section 3.2 of this Agreement at [HOST COLLECTION SITE] and shall cooperate with MED-Project and its Vendor in the provision of these Services. Such cooperation includes, but is not limited to:
  - 1.2.1. Identifying a Manager at [HOST COLLECTION SITE]
  - 1.2.2. Requesting a Kiosk(s) from MED-Project:

# Appendix D *Continued*

## Template Agreement

- 1.1.1. For law enforcement agency Hosts: if necessary, within 30 days of the Effective Date of this Agreement and/ or if a Kiosk becomes damaged or malfunctions and cannot be repaired by Vendor;
- 1.1.2. For Hosts that are not law enforcement agencies: within 30 days of the Effective Date of this Agreement.
- 1.1.1. Notifying Vendor of any Kiosk maintenance concerns or needs, including, but not limited to, any damage to or malfunction of a Kiosk;
- 1.1.2. Ensuring Host employees, including the Manager, perform all of their obligations in the Standard Operating Procedures provided as Exhibit B (including when collection is performed pursuant to Emergency Requests), and;
- 1.1.3. Labeling Kiosks with the signage provided in the MED-Project Product Stewardship Plan Appendix F.

### 1. Payment.

- 1.1. Host shall not be responsible for paying the charges of Vendor for the Services Vendor renders under Section 3.2 of this Agreement.

### 2. Nature of the Relationship.

- 2.1. Each Party is entering into and will perform the activities contemplated by this Agreement solely as an independent entity. This Agreement does not create any other relationship between the Parties, or with Vendor, including but not limited to the relationship of partners, joint venturers, or agent or legal representative of the other for any purpose whatsoever. Neither Parties will (i) make any representation that would create an apparent agency, partnership or joint venture relationship with the other Party or with Vendor, (ii) have the power, expressed or implied, to obligate or bind the other or the Vendor in any manner whatsoever, or (iii) be responsible for any act or omission of the other or the Vendor or any employee of the other or of the Vendor. No employee of Host, MED-Project or the Vendor is or will be considered an employee of the other Party or the Vendor for any purpose in connection with the performance of this Agreement.

### 1. Report of Theft or Diversion.

- 1.1. In the event of any theft or diversion of Unwanted Medicine collected at a Kiosk, or environmental incident, including spills and releases reported to any governmental authority, occurring during performance of this Agreement, the Party that becomes aware of such condition or event shall notify the other Party immediately.

### 2. Indemnification.

- 2.1. To the fullest extent permitted by law, MED-Project shall defend, indemnify, and hold harmless Host from and against all Losses to the extent arising out of or related to any and all third party claims, liabilities, liens, demands, obligations, actions, proceedings, suits or causes of action to the extent arising out of or related to MED-Project's (a) breach of this Agreement, or (b) sole negligence, recklessness or willful misconduct.
- 2.2. Notwithstanding the foregoing language in Section 7.1, MED-Project shall not be liable for Losses under Section 7.1 to the extent such Losses arise out of or related to Host's (a) breach of this Agreement, or (b) sole negligence, recklessness, or willful misconduct.

### 3. Term, Termination.

- 3.1. The term of this Agreement shall commence as of the Effective Date and shall continue in force until:
  - 3.1.1. Notice from Host to MED-Project of MED-Project's breach of this Agreement. This Agreement shall terminate immediately upon such notice.
  - 3.1.2. Notice from MED-Project to Host of Host's breach of this Agreement. This Agreement shall terminate immediately upon such notice.
  - 3.1.3. Notice from either Party to the other Party that this Agreement is terminated without cause. This Agreement will terminate seven days after such notice.
  - 3.1.4. If the representations and warranties set forth in Section 2.1 or 2.2 cease to continue to be correct, or (ii) DEA issues a notice, guidance, regulation or other communication applicable to Host, Vendor or MED-Project making it reasonable to conclude that activities contemplated by this Agreement are viewed by DEA as impermissible or a violation of Applicable Laws, this Agreement shall terminate immediately.

# Appendix D *Continued*

## Template Agreement

1.1.1. Two years from the Effective Date, unless the Termination Date is extended pursuant to Section 14 of this Agreement.

1.1. MED-Project shall remove the Kiosk from the [HOST COLLECTION SITE] as provided in Section 3.2.6 of this Agreement. This shall be MED-Project's sole financial obligation with respect to any termination of the Agreement.

### 1. Severability.

1.1. In the event any provision of this Agreement shall be judicially interpreted or held to be void or otherwise unenforceable as written, such provision shall be deemed to be revised and modified to the extent necessary to make it legally enforceable. In the event that a provision cannot be made legally enforceable, the remaining terms of this Agreement shall be enforceable as though the void or unenforceable provision did not exist.

### 2. Assignment/Subcontracting.

2.1. Except as expressly contemplated under this Agreement, neither Party shall assign or subcontract any of its duties or obligations hereunder or assign this Agreement or its rights hereunder without the express written permission of the other Party, such consent not to be unreasonably withheld. Any assignment, delegation or subcontracting in violation of the above shall be void and ineffective. Notwithstanding this or any other provision of this Agreement, MED-Project shall have the right at any time to substitute Vendors by notifying Host in writing of such change.

### 3. Survival.

3.1. The obligations set forth in Sections 5, 7, 8.3, and 17 shall survive termination of this Agreement.

### 4. Third Party Beneficiaries.

4.1. Except as specifically set forth herein, nothing in this Agreement, express or implied, is intended or shall be construed to confer upon or give to any person, entity, company or organization, other than the Host or MED-Project, any right, remedy, cause of action or claim under or by reason of this Agreement or any term or provision hereof, all of which shall be for the sole and exclusive benefit of the Host and MED-Project.

### 1. Notice.

1.1. All notices to be provided in connection with this Agreement, including "requests" in Sections 3.2.1, 3.2.2, 3.2.4, 3.2.9, and 3.4.2 of this Agreement, shall be in writing. Notices shall be deemed effective (i) when delivered by hand to the Party entitled to receive notice, (ii) on the next business day after delivery to a nationally-recognized express delivery service with instructions and payment for overnight delivery, or (iii) upon confirmation of receipt when sent by e-mail.

1.2. All notices in connection with this Agreement shall be sent to the individual or individuals that each Party designates to receive such correspondence on behalf of the Party. Initially, notices shall be provided, if to MED-Project, to:

[MED-PROJECT CONTACT]

and if to Host, to:

[HOST CONTACT]

### 2. Complete Agreement, Headings, Modification.

2.1. This Agreement, along with its Exhibits, sets forth the complete agreement of the Parties with respect to the subject matter hereof. No prior or contemporaneous oral or written agreement or representation shall be effective to modify the express terms of this Agreement. Headings have been inserted for the convenient reference of the Parties and shall not be used to modify or interpret the express terms of the Agreement. No modification to this Agreement shall be valid unless it is made in writing, specifically states that it amends this Agreement, and is signed by authorized representatives of both Parties.

### 3. Signatures.

3.1. This Agreement is legally binding when, and not until, each Party has received from the other a counterpart of this Agreement signed by an authorized representative. The Parties' may sign separate, identical counterparts of this document; taken together, they constitute one Agreement. The signed counterpart may be delivered by any reasonable means, including electronic transmission.

# Appendix D *Continued*

## Template Agreement

### 1. Jurisdiction and Venue.

- 1.1. This Agreement is made and entered into in Washington state and shall be interpreted and construed in accordance with the laws of Washington state. The Parties submit to the exclusive jurisdiction of the Washington State and Federal Courts.

### 2. Publicity/Disclosure.

- 2.1. Unless required by law, neither Party may disclose the terms or subject matter of this Agreement to any third party, without the prior written consent of the other Party, except that MED-Project or Host may provide this Agreement to the King County Local Hazardous Waste Management Program and/or King County Prosecuting Attorney and Vendor.
- 2.2. Neither Party shall use the name, trade name, service marks, trademarks, trade dress or logos of the other Party in releases, advertising or any other publications, without such Party's prior written consent in each instance; except that either Party is authorized to use the other Party's name, trade name and logo with regard to public outreach and educational efforts taken with regard to the Plan. This provision applies to written and online releases and communications, including those appearing on a website and those circulated via social media platforms including, but not limited to, Facebook, Twitter, and LinkedIn.

### 3. Authority.

- 3.1. Each individual executing this Agreement in a representative capacity represents and warrants that he or she is duly authorized to execute and deliver this Agreement on behalf of the Party and its employees and that upon execution, this Agreement shall be binding upon the Party and its employees in accordance with its terms.

### 4. Anti-Bribery.

- 4.1. MED-Project shall, at all times, comply with any and all applicable anti-bribery, anti-corruption and/or similar laws, executive orders and/or regulations in the United States and Washington state. Notwithstanding this the MED-Project warrants that it has not, at any time, directly or indirectly, promised, offered or undertaken to promise or offer donations, gifts or other benefits whatsoever in order to influence or benefit any person or company in connection with this Agreement, the

- 1.1. Parties to the Agreement (or any of MED-Project's parent, affiliated, associated and/or subsidiary companies) or any other matter contained in this Agreement.

### 1. Waiver.

- 1.1. No consent or waiver, express or implied by a Party, to or of any breach or default by the other in the performance by that other Party of obligations under this Agreement shall be deemed or construed to be a consent or waiver to or of any other breach or default in the performance by that other Party of the same or any other obligation of that Party under this Agreement. Failure of a Party to complain of any act or failure to act of the other, or to declare the other in default, irrespective of how long that failure continues, shall not constitute a waiver by that Party of rights under this Agreement. The giving of consent by a Party in any one instance shall not limit or waive the necessity to obtain that Party's consent in any future instance.

### 2. Effective Date

- 2.1. The Agreement shall be effective on the last date signed by a Party in accordance with Section 15 of this Agreement.

IN WITNESS WHEREOF, the Parties hereto by their duly authorized representatives have executed and delivered this Agreement as of the Effective Date.

[Host]

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

King County MED-Project LLC

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

# Appendix D *Continued*

## Template Agreement

### Exhibit A

Kiosks Approved for Inclusion in the King County MED-Project Plan

[KIOSK IDENTIFIER]	LOCATION

## Appendix D *Continued*

### Template Agreement

#### Exhibit B

##### Standard Operating Procedures

1. Services in Section 3.2 of this Agreement, other than responses to Emergency Requests, will be conducted Monday - Friday from 8:00am - 6:00pm PST. Except for responses to Emergency Requests, these Services will not be conducted on nationally recognized holidays (Christmas, New Year's Day, Memorial Day, Thanksgiving, etc.).
2. The Service Technicians will park the service vehicle in an area designated by the Manager and enter the building from an entrance specified by the Manager. The Service Technicians will provide picture identification to the Manager upon request.
3. The Service Technicians shall ensure that, when unattended, the service vehicle shall be locked and the vehicle and its contents secured.
4. Upon entering the [HOST COLLECTION SITE], the Service Technicians will ask for the Manager. If the Manager is not available within 15 minutes (or 30 minutes in the case of an Emergency Request), the Service Technicians will exit the [HOST COLLECTION SITE] and follow-up with the Manager to reschedule service.
5. Once the Manager arrives, the Service Technicians will go directly to the Kiosk along with the Manager and another [HOST COLLECTION SITE] employee.
6. The Manager and other [HOST COLLECTION SITE] employee will produce keys to access the double-locked Kiosk.
7. The Manager and other [HOST COLLECTION SITE] employee will remove the inner container and liner from the Kiosk and seal the inner liner. The Kiosk will then be locked, including the small-opening that allows contents to be deposited into the Kiosk.
8. Under the supervision of the Manager and other [HOST COLLECTION SITE] employee, the Service Technicians will take the entire inner container and liner to the service vehicle for packaging.
9. The Service Technicians will place the inner container and liner in the back of the service vehicle.
10. The Service Technicians will weigh the inner container and liner, remove the liner from the container, and place the liner into an appropriately sized shipping container.
11. The shipping container will be lined to prevent any leakage.
12. The Service Technicians will attach a unique barcode label that will be confirmed by Vendor once received at the designated disposal facility.
13. The Service Technicians will secure the shipping container with tamper evident tape. All shipping containers will be marked and labeled in compliance with Applicable Laws.
14. The Service Technicians will return to the [HOST COLLECTION SITE] with the Manager and other [HOST COLLECTION SITE] employee and present any paperwork required by Applicable Laws to the Manager.
15. The Manager, other [HOST COLLECTION SITE] employee, and the Service Technicians will return to Kiosk for inspection. The Manager and other [HOST COLLECTION SITE] employee will produce keys to access the double-locked Kiosk.
16. Under the supervision of the Manager and other [HOST COLLECTION SITE] employee, the Service Technicians will replace the Kiosk liner in the inner container and place both into the Kiosk.
17. The Kiosk will be locked by the Manager and other [HOST COLLECTION SITE] employee, and the Service Technicians will exit the [HOST COLLECTION SITE], completing the service.

## Appendix D *Continued*

### Template Agreement

#### Exhibit C

Notice and Contact Data for Vendor

[VENDOR CONTACT INFORMATION]



## Appendix F

### A. Picture of Kiosk Prototype



The kiosk is approximately 42" tall x 19" wide x 20.5" deep (without handle).

The design of the kiosk recognizes the paramount importance of security through the use of heavy gauge steel, multiple locking mechanisms, tamper-proof slot and commercial hinges, meeting the stringent requirements under law. At the same time, the design provides accessibility and ease of use.

## Appendix F

### B. Sample Kiosk Signage

Top of Kiosk Key Art 42” tall x 19” wide x 20.5” deep

# SAFELY DISPOSE OF UNWANTED & EXPIRED MEDICINES

- 1 Cross out or remove personal identifying information from the medicine bottle.
- 2 Leave the product in its original container or place the medicine in a ziplock plastic bag.
- 3 Put medicine in kiosk. Alternatively, mail-back services are available to differentially-abled and home bound residents. Please refer people to the in-home disposal page ([www.med-project.org/king-county/in-home-disposal](http://www.med-project.org/king-county/in-home-disposal))

**✓ ACCEPTED:** MEDICATIONS IN PILL, CAPSULE OR LIQUID FORM IN THEIR ORIGINAL CONTAINER OR SEALED BAG

**✗ NOT ACCEPTED:** HERBAL REMEDIES, COSMETICS OR OTHER PERSONAL CARE PRODUCTS; MEDICAL DEVICES; PET PESTICIDE PRODUCTS; SHARPS; ILLICIT DRUGS

ONLY SCHEDULE II-V CONTROLLED AND NON-CONTROLLED SUBSTANCES THAT ARE LAWFULLY POSSESSED BY THE ULTIMATE USER ARE ACCEPTABLE TO BE PLACED IN THE KIOSK. SCHEDULE I CONTROLLED SUBSTANCES, ILLICIT OR DANGEROUS SUBSTANCES, AND ANY CONTROLLED SUBSTANCES NOT LAWFULLY POSSESSED BY THE ULTIMATE USER MAY NOT BE PLACED IN THE KIOSK.

For more information about the King County Med-Project program, please go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-Proj.

**King County MED-Project**  
Medication Education & Disposal

Sample – Not for Distribution. All text subject to change pending review and approval by King County.

## Appendix F

### C. Sample Kiosk Signage

Side Panel of Kiosk 42" tall x 19" wide x 20.5" deep



Sample – Not for Distribution. All text subject to change pending review and approval by King County.

## Appendix F

### D. Sample Kiosk Signage

Front Panel of Kiosk 42” tall x 19” wide x 20.5” deep



**King County MED-Project**  
Medication Education & Disposal

# Appendix G

## Possible Contact List For Outreach and Education to the Community

The following are Associations, Agencies, and Organizations that will be contacted for assistance with outreach and education to the community. They will also be contacted to participate as potential future drop-off sites or take-back event sponsors. King County Med-Project will also contact existing drop-off sites.

### Health Systems:

- Auburn Regional Medical Center in Auburn
- Caldwell Health Center in Des Moines
- Childrens' Hospital and Regional Medical Center in Seattle North
- Enumclaw Community Hospital in Enumclaw
- Evergreen Hospital Medical Center in Kirkland
- Fairfax Hospital in Kirkland
- Group Health Medical Center in Mercer Island, Kirkland, Seattle South
- Harborview Medical Center in Seattle South
- Healthpoint Auburn Medical and Dental Center in Redmond
- Highline Medical Center in Des Moines
- Kindred Hospital Seattle in Seattle North
- Mason Hospital in Seattle South
- Northwest Hospital in Seattle North
- Overlake Hospital Medical Center in Mercer Island, Kirkland
- Providence Mount Saint Vincent Medical Center in Duwamish Head
- Riverton General Hospital in Des Moines
- Saint Francis Hospital in Poverty Bay
- Shick Shadel Hospital in Des Moines
- Snoqualmie Valley Hospital in Snoqualmie
- Swedish Medical Center in Shilshole Bay, Seattle South, Issaquah
- United States Marina Hospital in Seattle South
- University of Washington Medical Center in Seattle North
- Valley Medical Center in Renton
- Veterans Affairs Medical Center Seattle in Seattle South
- Virginia Mason Medical Center in Seattle South

### Health Associations:

- Washington State Board of Pharmacy
- Washington State Pharmacy Association (WSPA)
- Washington State Department of Health
- Washington State Medical Commission
- Washington State Nurses Association (WSNA)
- King County Nurses Association (KCNA)
- King County Board of Health
- King County Medical Society (KCMS)

### Organizations, Districts, and Agencies:

- King County Solid Waste Division
- Washington State Recycling Association (WSRA)
- Washington State Pharmacy Quality Assurance Commission (WSPQAC)
- King County Department of Community and Human Services
- King County Department of Public Health
- Municipal Utilities Districts
- Water Quality and Water Agencies
- School Districts, Campuses, and University Systems
- King County Council

A list of pharmacies and LEAs that may serve as Drop-Off Sites is available at <http://kingcountysecuremedicinereturn.org/king-county-pharmacies-and-law-enforcement/>

# Appendix H

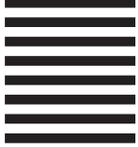
## Sample Mail-Back Package

### Sample Mail-back Package



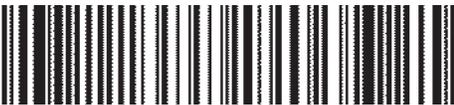
Street Address: \_\_\_\_\_  
City/State: \_\_\_\_\_ ZIP: \_\_\_\_\_  
POSTAGE DUE COMPUTED BY DELIVERY UNIT

NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



### FIRST CLASS MAIL

USPS TRACKING #



9221 6901 0328 7207 2035 85

**MERCHANDISE RETURN LABEL**  
PERMIT NO. XXX INDIANAPOLIS IN 123456  
STERICYCLE, INC. 1234 MERCHANT RD

**POSTAGE DUE UNIT**  
**US POSTAL SERVICE**  
**2670 EXECUTIVE DRIVE**  
**INDIANAPOLIS, IN 46241-1111**

**Description:**

Plastic Envelope with Merchandise Return Label and instructional flyer

**Page Size :**

Envelope: Outer Dimension: 8.063" x 10.5" Inner Dimension: 7.81" x 10.375", 2" flap (Hot Melt Tape- Tamper Evident)

Merchandise Return Label: 3" x 8"

Instructional Sheet: 5.5" x 8.5"

**Paper Stock :**

Envelope: 4mil white/ silver poly mailer w/sequential barcode

Return Label: 60# uncoated label stock

Instructional Sheet: 80# Gloss Text

**Color :**

Envelope: 5/3 Print: Silver, white, white, + 2 PMS on clear web; Silver + 2 PMS on white web

Return Label: K/O no bleeds (personalized barcode)

Instructional sheet: K/K

# Appendix I

## Request for Approval for Mail-Back Package Disposal

**King County MED-Project**  
Medication Education & Disposal

King County MED-Project LLC  
1155 15th Street, NW | Suite 500  
Washington, DC 20005  
Phone: (202)495-3131 | Fax: (202)530-0659  
[ppswg@amsnavista.com](mailto:ppswg@amsnavista.com)

November 16, 2015

**VIA EMAIL**

Taylor Watson  
Program Implementation Manager  
Secure Medicine Return  
Local Hazardous Waste Program in King County  
130 Nickerson St., Suite 100  
Seattle, WA 98109

Re: King County MED-Project LLC Mail-back Program

Dear Ms. Watson:

King County MED-Project LLC (“MED-Project”) submits this request for King County to approve MED-Project’s disposal of mail-back packages under the King County Board of Health Secure Medicine Return Regulations (“Regulations”) Section 11.50.080(B). Regulations Section 11.50.080(B) provides that King County may approve the disposal of some or all unused, unwanted pharmaceutical products collected from King County residents at permitted large municipal waste combustors if disposal at permitted hazardous waste disposal facilities is “not feasible” based on “logistics or other considerations.”

As King County has acknowledged, such permitted hazardous waste disposal facilities are not available to accept mail-back packages at this time. Thus, MED-Project is proposing a two-phase process using the Stericycle, Inc., Indianapolis, Indiana Facility (the “Stericycle Facility”) and Covanta Indianapolis Inc., Indianapolis Resource Recovery Facility (the “Covanta Facility”) to dispose of mail-back packages. Under this two-phase process, mail-back packages are accepted at the Stericycle Facility and rendered non-retrievable on-site. The non-retrievable mail-back package materials are then shipped for incineration to the Covanta Facility, a municipal waste combustor providing waste-to-energy incineration.

As described in the enclosed submission, because the disposal of mail-back packages at permitted hazardous waste facilities is not feasible at this time, under Regulations Section 11.50.080(B) King County should approve MED-Project’s two-phase process for the disposal of mail-back packages. We look forward to discussing this proposal with you.

Sincerely,



Carrie Hoffman  
King County MED-Project LLC

## Appendix I *Continued*

### Request for Approval for Mail-Back Package Disposal

**KING COUNTY MED-PROJECT REQUEST FOR APPROVAL FOR MAIL-BACK  
PACKAGE DISPOSAL**

**King County MED-Project**  
Medication Education & Disposal

**November 16, 2015**

## Appendix I *Continued*

### Request for Approval for Mail-Back Package Disposal

#### **King County MED-Project Request for Approval for Mail-back Package Disposal**

Pursuant to section 11.50.080(B) of the King County Board of Health Secure Medicine Return Regulations (the “Regulations”), King County MED-Project LLC (“MED-Project”) requests the Seattle-King County Department of Public Health Director’s (“King County’s”) approval to use the Covanta Indianapolis Inc., Indianapolis Resource Recovery Facility (the “Covanta Facility”), via the Stericycle, Inc., Indianapolis, Indiana Facility (the “Stericycle Facility”), for the disposal of mail-back packages.<sup>1</sup> MED-Project is proposing a two-phase disposal process. As described below, mail-back packages (including any controlled substances therein)<sup>2</sup> will be accepted at the Stericycle Facility where they will be rendered non-retrievable in compliance with United States Drug Enforcement Agency (“DEA”) requirements and then incinerated at the Covanta Facility, a municipal waste combustor. This two-phase process allows MED-Project to safely dispose of mail-back packages in compliance with DEA requirements at a municipal waste combustor, the type of facility recently approved by King County for mail-back package disposal.

As King County has recognized, because permitted hazardous waste disposal facilities cannot accept mail-back packages under current DEA and Resource Conservation and Recovery Act (“RCRA”) or similar state requirements, disposal at such facilities is not feasible at this time. *See* Letter from Taylor Watson, King County Local Hazardous Waste Management Program to Carrie Hoffman, King County MED-Project LLC (Sept. 21, 2015) (the “Watson Letter”). MED-Project’s proposed Covanta Facility and Stericycle Facility two-phase process should be approved under Regulations section 11.50.080(B) because “logistics or other considerations” prohibit disposal at permitted hazardous waste disposal facilities.

#### **I. The Covanta Facility and Stericycle Facility Two-Phase Process for the Disposal of Mail-back Packages**

MED-Project proposes a two-phase process for managing and disposing of mail-back packages. This process reconciles DEA and RCRA requirements and results in incineration at the Covanta Facility, a fully permitted municipal waste combustor. However, the Covanta Facility is not a DEA registrant and thus cannot accept mail back packages from King County residents.

Under the MED-Project Plan’s mail-back program, King County residents can request a mail-back package by calling the MED-Project call center or using the MED-Project website.

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<sup>1</sup> As King County is aware, covered drugs collected from sources other than mail-back are proposed to be disposed at a permitted hazardous waste facility, however, this facility cannot accept mail-back packages because it does not have a DEA registration.

<sup>2</sup> The term “mail-back packages” as used in this submission means both the mail-back envelope itself and the contents therein. Mail-back packages will be collected as described in King County MED-Project Product Stewardship Plan (“Plan”) section VII.

## Appendix I *Continued*

### Request for Approval for Mail-Back Package Disposal

Plan § VII.C. Upon such request, residents are provided a pre-addressed, prepaid mail-back envelope. Envelope shipment is recorded using a unique barcode. Residents will fill the mail-back envelope according to provided instructions and return the mail-back package via United States Postal Service First Class Mail to the Stericycle Facility.<sup>3</sup>

**A. Phase I – The Stericycle Facility Accepts Mail-back Packages from King County Residents and Renders Them Non-Retrievable Pursuant to DEA Requirements**

Phase one of the proposed process is the acceptance of mail-back packages at the Stericycle Facility. The Stericycle Facility is DEA registered and complies with applicable DEA and RCRA requirements.<sup>4</sup> Thus, the Stericycle Facility will accept mail-back packages and, as required by 21 C.F.R. § 1317.05(c), use an on-site method to promptly render the mail-back packages non-retrievable. This onsite destruction rendering the mail-back packages non-retrievable will occur on at least a weekly basis, and more frequently depending on volume received.

When mail-back packages are received from King County residents at the Stericycle Facility, Stericycle Environmental Solutions Inc., (“Stericycle”) will scan the mail-back packages’ unique barcode to record receipt and then store the mail-back packages in Stericycle’s vault for DEA controlled substances.

Mail-back packages are processed for destruction at the Stericycle Facility in a DEA-secure area. The mail-back packages are rendered non-retrievable, as defined in 21 C.F.R. § 1300.05(b),<sup>5</sup> through a proprietary chemical-based process. The active ingredients of the unused medication in the mail-back packages are dissolved by a non-hazardous chemical solution and

---

<sup>3</sup> The Stericycle Facility’s mailing address is Stericycle Inc., 2670 Executive Drive, Suite A, Indianapolis, IN 46241-9901.

<sup>4</sup> The Stericycle Facility’s DEA Registration Number is RS0331607; its RCRA Permit Number is INR000110197.

<sup>5</sup> The package of new requirements imposed by the DEA final rule, Disposal of Controlled Substances, 79 Fed. Reg. 53520 (Sept. 9, 2014) (the “DEA Rule”), included the non-retrievable destruction standard. The DEA Rule defines non-retrievable as:

the condition or state to which a controlled substance shall be rendered following a process that permanently alters that controlled substance’s physical or chemical condition or state through irreversible means and thereby renders the controlled substance unavailable and unusable for all practical purposes. . . . A controlled substance is considered “non-retrievable” when it cannot be transformed to a physical or chemical condition or state as a controlled substance or controlled substance analogue. . . .

21 C.F.R. § 1300.05.

## Appendix I *Continued*

### Request for Approval for Mail-Back Package Disposal

are absorbed and neutralized by the chemical solution's main ingredient. These non-retrievable materials are then collected in drums and sealed for secure transportation to the Covanta Facility. A security seal is placed on the trailer transporting the non-retrievable materials and this seal is verified upon arrival at the Covanta Facility. A Stericycle witness follows the non-retrievable materials to the Covanta Facility and witnesses their incineration.

#### **B. Phase II – The Covanta Facility Incinerates the Non-Retrievable Materials**

Phase-two of MED-Project's proposed process is incineration of the non-retrievable materials, including mail-back packages and their contents, at the Covanta Facility. The Covanta Facility is a permitted large municipal waste combustor.<sup>6</sup>

As an additional benefit, the Covanta Facility is a waste-to-energy facility using municipal solid waste, like non-retrievable mail-back packages, to generate renewable energy. Steam recovered from incineration at the Covanta Facility helps power the Indianapolis downtown heating loop, which includes Indiana University and Purdue University's Indianapolis campus. *See* Covanta, About Covanta Indianapolis (October 31, 2015), <http://www.covanta.com/facilities/facility-by-location/indianapolis/about.aspx>. By incinerating non-retrievable materials at the Covanta Facility, MED-Project's two-phase process is able to facilitate renewable energy generation.

#### **II. Standard for King County to Approve a Municipal Waste Combustor for the Disposal of Mail-back Packages**

Under Regulations section 11.50.080(B):

The director may grant approval for a producer or group of producers participating in the standard stewardship plan or an independent stewardship plan to dispose of some or all collected covered drugs at a permitted large municipal waste combustor . . . if use of a hazardous waste disposal facility . . . is deemed not feasible for the stewardship plan based on cost, logistics or other considerations.

Regulations § 11.50.080(B). As described below, MED-Project proposes to use the Covanta Facility and Stericycle Facility two-phase process because permitted hazardous waste disposal facilities are unavailable at this time to dispose of mail-back packages due to conflicting regulatory regimes.

#### **III. The Covanta Facility and Stericycle Facility Two-Phase Process Should Be Approved Because Logistics or Other Considerations Prohibit Disposal of Mail-back Packages at Permitted Hazardous Waste Disposal Facilities**

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<sup>6</sup> *See* Indiana Department of Environmental Management, Permitted Solid Waste Facilities List (Oct. 31, 2015), <http://www.in.gov/idem/landquality/2412.htm> (Permitted Solid Waste Facilities List, PDF page 25).

## Appendix I *Continued*

### Request for Approval for Mail-Back Package Disposal

The Regulations provide that “[c]overed drugs collected under a stewardship plan must be disposed of at a permitted hazardous waste disposal facility.” Regulations § 11.50.080(A). MED-Project and its vendor, Stericycle, have spent months attempting to identify a permitted hazardous waste disposal facility capable of disposing mail-back packages in compliance with all DEA, RCRA, and state-analog requirements. Despite ongoing efforts, we have not identified a permitted hazardous waste disposal facility registered under the DEA Rule and subject to RCRA permit requirements that would allow it to incinerate mail-back packages collected by MED-Project.<sup>7</sup>

King County recently acknowledged that that such permitted hazardous waste disposal facilities meeting the requirements of the Regulations may not be available to accept mail-back packages. *See* Watson Letter. In doing so, King County indicated that it was “considering granting approval . . . to allow use of a permitted large municipal waste combustor for disposal of covered drugs collected using mail-back services.” *Id.* King County has since approved a municipal waste combustor for the disposal of mail-back packages. *See* Letter from Patty Hayes, Seattle & King County Public Health to Leo Raudys, ReturnMeds, LLC (Oct. 16, 2015).

Because there are currently no permitted hazardous waste disposal facilities capable of disposing mail-back packages, disposal at a permitted hazardous waste disposal facility is, at minimum, “not feasible” based on logistics or other considerations. Regulations § 11.50.080(B). Accordingly, King County should approve the disposal of mail-back packages at the Covanta Facility, a municipal waste combustor, via the Stericycle Facility as proposed by MED-Project under Regulations section 11.50.080(B).

#### **IV. Conclusion**

For the foregoing reasons, MED-Project’s proposed Covanta Facility and Stericycle Facility two-phase process for the disposal of mail-back packages should be approved under Regulations section 11.50.080(B).

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<sup>7</sup> The Regulations were adopted in 2013, over a year before promulgation of the DEA Rule, and do not contemplate these regulatory hurdles currently prohibiting mail-back package disposal at permitted hazardous waste disposal facilities.

# Appendix J

## Sample Media List

The following is a representative list of key media outlets to help educate King County residents about proper disposal of expired or Unwanted Medicines. The list includes local print, online, television and radio outlets, as well as outlets specifically targeting the diverse demographic communities within the County.

Print Outlets	City/Coverage Area	Website
Allied Law Group	Seattle	<a href="http://www.alliedlawgroup.com">www.alliedlawgroup.com</a>
Auburn Reporter	Auburn	<a href="http://www.auburn-reporter.com">www.auburn-reporter.com</a>
Bellevue Reporter	Bellevue	<a href="http://www.bellevuereporter.com">www.bellevuereporter.com</a>
Bothell/Kenmore Reporter	Kirkland	<a href="http://www.bothell-reporter.com">www.bothell-reporter.com</a>
Capitol Hill Times	Bellevue	<a href="http://www.capitolhilltimes.com">www.capitolhilltimes.com</a>
City Living	Seattle	<a href="http://www.citylivingseattle.com/">www.citylivingseattle.com/</a>
Covington/Maple Valley Reporter	Maple Valley	<a href="http://www.covingtonreporter.com">www.covingtonreporter.com</a>
Daily Journal of Commerce	Seattle	<a href="http://www.djc.com">www.djc.com</a>
Eastern European Echo	Seattle	<a href="http://www.theecho.us">www.theecho.us</a>
Enumclaw Courier-Herald	Enumclaw	<a href="http://www.courierherald.com">www.courierherald.com</a>
Federal Way Mirror	Federal Way	<a href="http://www.fedwaymirror.com">www.fedwaymirror.com</a>
Issaquah Press	Issaquah	<a href="http://www.issaquahpress.com">www.issaquahpress.com</a>
Issaquah/Sammamish Reporter	Bellevue	<a href="http://www.issaquah-reporter.com">www.issaquah-reporter.com</a>
Kent Reporter	Kent	<a href="http://www.kentreporter.com">www.kentreporter.com</a>
Kirkland Reporter	Kirkland	<a href="http://www.kirklandreporter.com">www.kirklandreporter.com</a>
Mercer Island Reporter	Bellevue	<a href="http://www.mi-reporter.com">www.mi-reporter.com</a>
Northwest Asian Weekly	Seattle	<a href="http://www.nwasianweekly.com">www.nwasianweekly.com</a>
Northwest Vietnamese News	Seattle	<a href="http://www.nvnorthwest.com">www.nvnorthwest.com</a>
Queen Anne/Magnolia News	Seattle	<a href="http://www.queenannenews.com">www.queenannenews.com</a>
Redmond Reporter	Kirkland	<a href="http://www.redmond-reporter.com">www.redmond-reporter.com</a>
Russian World	Kirkland	<a href="http://www.russianworldnewspaper.com">www.russianworldnewspaper.com</a>
Sammamish Review	Issaquah	<a href="http://www.sammamishreview.com">www.sammamishreview.com</a>
Snoqualmie Valley Record	Snoqualmie	<a href="http://www.valleyrecord.com">www.valleyrecord.com</a>
SnoValley Star	Issaquah	<a href="http://www.snovalleystar.com">www.snovalleystar.com</a>
The Daily, Univ. of Washington	Seattle	<a href="http://www.thedaily.washington.edu">www.thedaily.washington.edu</a>
Vashon-Maury Island Beachcomber	Vashon	<a href="http://www.vashonbeachcomber.com">www.vashonbeachcomber.com</a>
Woodinville Weekly	Woodinville	<a href="http://www.nwnnews.com">www.nwnnews.com</a>

## Appendix J *Continued*

### Sample Media List

Television Outlets	Network
KOMO	ABC
KING	NBC
KIRO	CBS
KCTS	PBS
KSTW (licensed to Tacoma, studios in Seattle)	The CW
KVOS (licensed to Bellingham)	Me-TV
KCPQ (licensed to Tacoma, studios in Seattle)	Fox
KONG (licensed to Everett, studios in Seattle)	Independent
Radio Outlets	City/Coverage Area
KVI	Seattle
KIRO	Seattle
KTTH	Seattle
KGNW	Burien
KIXI	Mercer Island
KJR	Seattle
KOMO	Seattle
KBLE	Seattle
KFNQ	Seattle
KKXA	Snohomish
KXPA	Bellevue
KLFE	Seattle
KYIZ	Renton
KNTS	Seattle
KNHC	Seattle
KEXP	Seattle
KBCS	Bellevue
KQMV	Bellevue
KUBE	Seattle

## Appendix J *Continued*

### Sample Media List

Radio Outlets	City/Coverage Area
KMPS	Seattle
KUOW	Seattle
KJR	Seattle
KJAQ	Seattle
KING	Seattle
KLCK	Seattle
KISW	Seattle
KKWF	Seattle
KPLZ	Seattle
KZOK	Seattle
KMCQ	Covington
KNDD	Seattle

## Appendix K

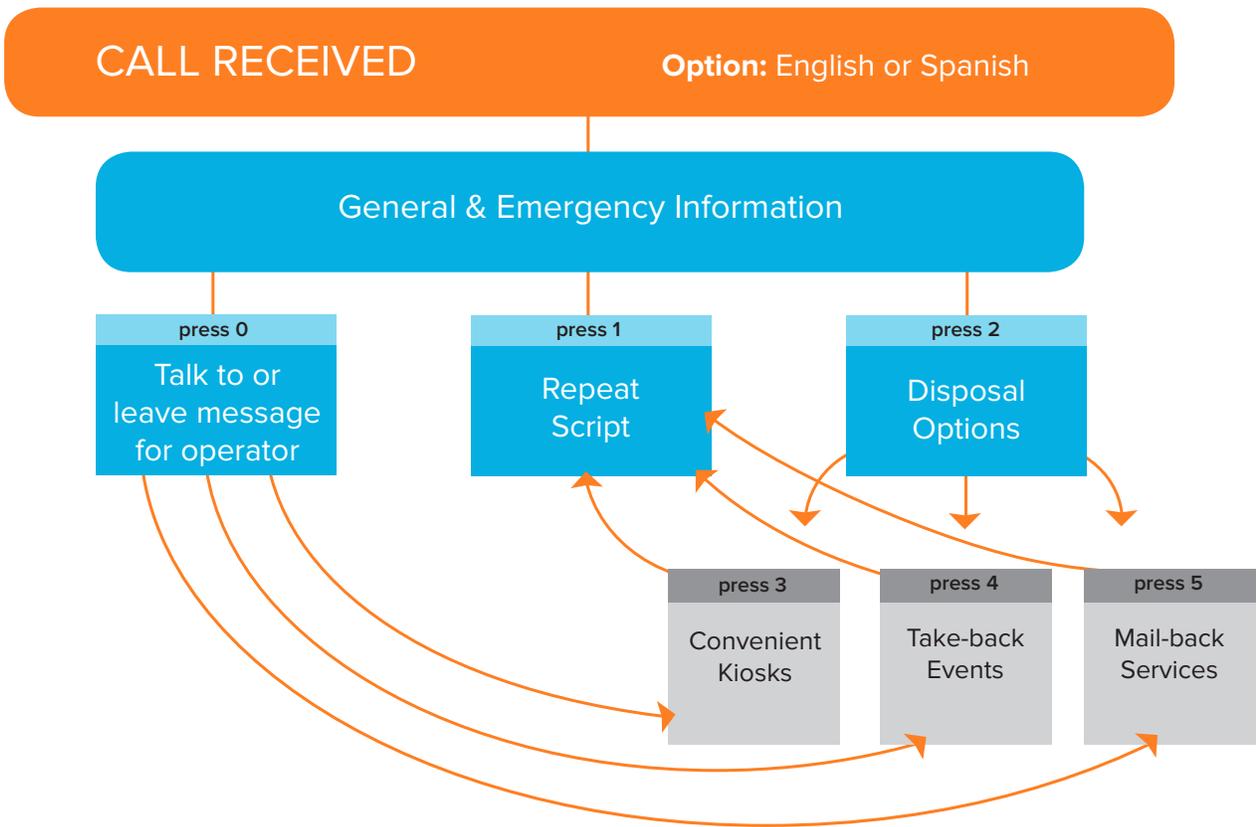
### Sample Template: Education and Outreach Call Script [1-844-MED-Proj]

Residents will also be able to select a Spanish version.

## King County Med-Project

Medication Education & Disposal

Thank you for calling the information line for the King County Medication Education and Disposal Project, or King County MED-Project.



## Appendix K *Continued*

### Sample Template: Education and Outreach Call Script [1-800-MED-Proj]

#### **Press 1 for Spanish or remain on the line for English**

- If you are experiencing a medical emergency, please hang up and dial 9-1-1.
- If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call the Washington Poison Center at 800-222-1222.
- Kiosks are located throughout the County and provide convenient options for returning expired or unwanted medicines. Press 3 for more information about convenient kiosks.
- Take-back events are scheduled throughout the year and offer residents a free and convenient way to dispose of expired or Unwanted Medicines. Press 4 for more information.
- Mail-back services are available to King County residents. Press 5 for more information.
- You may press 0 at any time to speak with an operator about disposal options.
- King County MED-Project is a consumer education campaign dedicated to proper medication use and consumer disposal.
- King County MED-Project reminds you that taking your medicine as directed by your health care provider is critically important to your health.
- If you have questions about your medication, please hang up and dial your health care provider.
- For additional questions about the proper disposal of expired or unwanted medications from households, please go to [www.med-project.org/KingCounty](http://www.med-project.org/KingCounty) or press 0 to talk to an operator.
- To hear this menu again, please press 1
- *Thank you for calling King County MED-Project.*

#### **Kiosk Script for when 3 is selected:**

- Kiosks to collect expired and unwanted medicine are located conveniently through King County. To locate the kiosk site nearest you, or for precise information about kiosk hours of operation, press 0 to speak with an operator or visit <http://med-project.org/kingcounty/convenient-kiosks> to search by your zip code.
- Prescription and non-prescription medicines in pill, capsule, aerosol, or liquid form may be turned in at kiosks. This includes legally prescribed controlled substances such as pain killers and ADHD medications. No illicit drugs, medical devices, or needles will be accepted.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications.
- To repeat this information, press 3.
- To return to the main menu, please press 1.
- *Thank you for calling King County MED-Project.*

## Appendix K *Continued*

### Sample Template: Education and Outreach Call Script [1-800-MED-Proj]

#### **Take-back Script for when 4 is selected:**

- King County MED-Project is working with local law enforcement and other community organizations to offer regular expired and unwanted medicine take-back events throughout the County. For a complete list of take-back events, please press 0 to speak to the operator or visit: <http://med-project.org/kingcounty/take-back-events>.
- Prescription and non-prescription medicines in pill, capsule, aerosol, or liquid form may be turned in at a take-back event. This includes legally prescribed controlled substances such as pain killers and ADHD medications. No illicit drugs, medical devices, or needles will be accepted.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications.
- To repeat this information, press 4.
- To return to the main menu, please press 1.
- *Thank you for calling King County MED-Project.*

#### **Mail-back Package Script for when 5 is selected:**

- Mail-back services are available to King County residents who are home bound or differentially-abled, home healthcare professionals providing services to differentially-abled or home bound and, in some cases, to those who live in an area where no kiosk sites are available.
- To request a mail-back package, please press 0 to talk to the operator or visit <http://med-project.org/kingcounty/mail-back>.
- Prescription and non-prescription medicines in pill, capsule, aerosol, or liquid form may be placed in a mail-back package. This includes legally prescribed controlled substances such as pain killers and ADHD medications. No illicit drugs, medical devices, or needles will be accepted.
- To protect your privacy, remove or black out all personally identifiable information before disposing of your medications.
- To repeat this information, press 5.
- To return to the main menu, please press 1.
- *Thank you for calling King County MED-Project.*

# Appendix L

## King County MED-Project Website

**King County MED-Project**  
Medication Education & Disposal

Search by county  
King County, WA

MEDinfo MEDfaq Contact

Medicines help treat diseases, manage chronic conditions, and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider. However, if you have expired or unwanted medication, proper disposal is important and easy.



CLICK ON ANY OF THE RECOMMENDED DISPOSAL OPTIONS BELOW TO LEARN MORE

- CHECK THE PACKAGE
- TAKE-BACK EVENTS
- CONVENIENT KIOSKS
- IN-HOME DISPOSAL

FIND THE NEAREST DISPOSAL LOCATION

Enter your zip code or city and state:

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.

# Appendix L

## King County MED-Project Website

**King County MED-Project**  
Medication Education & Disposal



### CHECK THE PACKAGE

If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions. Do not flush any medication down the toilet unless the information on the label, package or package insert specifically instructs you to do so.



**CHECK THE  
PACKAGE**



**TAKE-BACK  
EVENTS**



**CONVENIENT  
KIOSKS**



**IN-HOME  
DISPOSAL**

Source: <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm>

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or Individual producers.

# Appendix L

## King County MED-Project Website

**King County MED-Project**  
Medication Education & Disposal



### TAKE-BACK EVENTS

Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines. The local authorities and King County MED-Project may also sponsor local drug take-back events in your area.



#### LOCAL TAKE-BACK EVENT DETAILS

**Monday, July 13, 2015**  
**TAKE-BACK EVENT**  
Maple Valley Police Department,  
22017 SE Wax Rd, #100,  
Maple Valley WA 98038  
2pm-5pm



**CHECK THE PACKAGE**



**TAKE-BACK EVENTS**



**CONVENIENT KIOSKS**



**IN-HOME DISPOSAL**

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# Appendix L

## King County MED-Project Website

**King County MED-Project**  
Medication Education & Disposal

Search by county  
King County, WA

*i*  
MEDinfo

  
MEDfaq

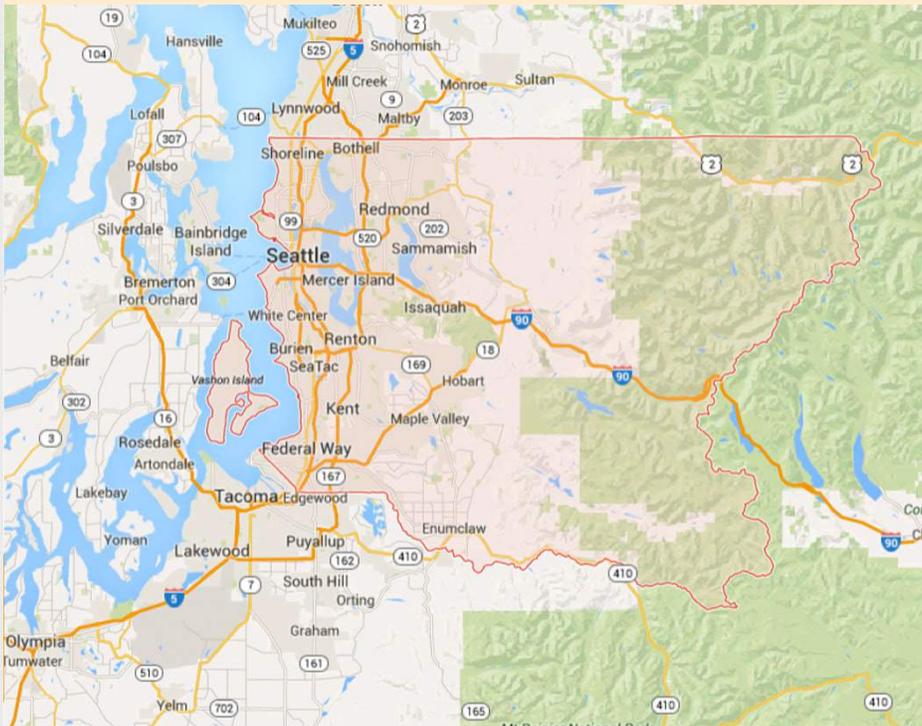
  
Contact

### CONVENIENT KIOSKS

Community drug drop-off sites allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal. To find the nearest disposal kiosk, enter your zip code below.

Enter your zip code

SUBMIT



CHECK THE  
PACKAGE



TAKE-BACK  
EVENTS



CONVENIENT  
KIOSKS



IN-HOME  
DISPOSAL

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.

# Appendix L

## King County MED-Project Website

**King County MED-Project**  
Medication Education & Disposal



### IN-HOME DISPOSAL

If no disposal instructions are given on the drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps. 1. Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs). 2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag. 3. Alternatively, mail-back services are available to differentially-abled and home bound residents. Click here to request a pre-paid, pre-addressed mail-back package.



**CHECK THE PACKAGE**



**TAKE-BACK EVENTS**



**CONVENIENT KIOSKS**



**IN-HOME DISPOSAL**

Source: <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm>, last updated May 19, 2014

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.

# Appendix L

## King County MED-Project Website

The screenshot shows the top navigation bar of the King County MED-Project website. On the left is the logo for "King County MED-Project Medication Education & Disposal". To the right are four navigation links: "Search by county" with a map icon, "MEDinfo" with an information icon, "MEDfaq" with a magnifying glass icon, and "Contact" with an envelope icon. Below the navigation bar is a large orange header with the word "CONTACT" in white. The main content area is white and contains three columns of text. The first column provides emergency instructions: "If you are experiencing a medical emergency, please dial 9-1-1.", "If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Washington Poison Control at 800-222-1222.", and "If you have questions about your medication, please dial your health care provider." The second column contains a link: "For answers to some frequently asked questions about MED-Project, [click here](#)." The third column provides contact information: "For more information about the King County MED-Project program, or to speak to a program representative, please call 1-844-MED-PROJ or (1-844-633-7765)." At the bottom of the page is a footer in an orange box with the text: "This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers."

**King County MED-Project**  
Medication Education & Disposal

Search by county  
King County, WA

MEDinfo

MEDfaq

Contact

### CONTACT

If you are experiencing a medical emergency, please dial 9-1-1.

If you are experiencing a non-emergency but suspect that you or a family member has ingested something poisonous, please call Washington Poison Control at 800-222-1222.

If you have questions about your medication, please dial your health care provider.

For answers to some frequently asked questions about MED-Project, [click here](#).

For more information about the King County MED-Project program, or to speak to a program representative, please call 1-844-MED-PROJ or (1-844-633-7765).

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.

# Appendix L

## King County MED-Project Website

The screenshot shows the top navigation bar of the King County MED-Project website. It includes the logo for King County MED-Project (Medication Education & Disposal), a search by county button for King County, WA, and icons for MEDinfo, MEDfaq, and Contact. Below the navigation bar is a header for the MEDfaq section. The main content area lists 17 frequently asked questions, each with a plus sign icon. The first question is expanded, showing its answer. The footer contains a disclaimer about the material's compliance with King County Board of Health regulations.

**King County MED-Project**  
Medication Education & Disposal

Search by county  
King County, WA

MEDinfo

MEDfaq

Contact

### MEDfaq

- What is the King County MED-Project?  
King County MED-Project is the public, non-profit entity implementing the King County Product Stewardship Plan, including the education and outreach programming.
- +** What should I do if I am having a medical emergency?
- +** What should I do if I think I have ingested something poisonous?
- +** What should I do if my pet has ingested medication?
- +** Whom should I call with a question about my medication?
- +** Where can I find information about the safe storage of medication?
- +** Where can I find information about King County MED-Project?
- +** Can I flush my medication down the toilet?
- +** Should I remove my personal information before disposing of my medication?
- +** Where are the King County MED-Project disposal locations nearest me?
- +** Will it cost me anything to dispose of my expired or unwanted medications?
- +** What items can I dispose of in the King County MED-Project kiosks?
- +** Will there be a take-back event in my area?
- +** Where else can I find information about the safe disposal of expired or unwanted medicines?
- +** I have a question not answered by this website. Is there someone I can contact with a question about King County MED-Project?
- +** Who determines the appropriate guidelines for safe disposal of expired or unwanted medications?
- +** Are King County MED-Project materials available in other languages?

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.

# Appendix L

## King County MED-Project Website

The screenshot displays the King County MED-Project website interface. At the top left is the logo for "King County MED-Project Medication Education & Disposal". To the right are navigation buttons: "Search by county" with a map of King County, WA; "MEDinfo" with an information icon; "MEDfaq" with a magnifying glass icon; and "Contact" with an envelope icon. Below the navigation is an orange header bar with the text "MEDinfo". The main content area contains three paragraphs of text. The first paragraph discusses the importance of taking medicines as prescribed and storing them securely. The second paragraph mentions disposal options and privacy reminders. The third paragraph lists additional resources like brochures and FAQs. At the bottom, a footer bar contains a disclaimer about compliance with King County Board of Health regulations.

**King County MED-Project**  
Medication Education & Disposal

Search by county  
King County, WA

*i*  
MEDinfo

MEDfaq

Contact

### MEDinfo

Medicines help treat diseases, manage chronic conditions and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent accidental ingestion or misuse by others in your household, especially children.

There are a number of ways to dispose of expired or unwanted medicines. To protect your privacy, consumers are reminded to remove all personally identifiable information on labels or materials before using any of the available disposal options.

For additional information on the program, King County MED-Project has developed an educational toolkit, including:

[Brochure](#); [Frequently Asked Questions](#); and [Public Service Announcement](#).

This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.

## Appendix M

Translations of the brochure and FAQ will be available in Spanish, Vietnamese, Mandarin, Russian, and Tagalog.

### Brochure/Flyer Mockup

# MEDICATION EDUCATION & DISPOSAL

What should you do with your expired or unwanted medicines?



**There are a number of ways to dispose of expired or unwanted medicines:**

-  CHECK THE PACKAGE
-  TAKE-BACK EVENTS
-  CONVENIENT KIOSKS
-  IN-HOME DISPOSAL

Medicines help treat diseases, manage chronic conditions and improve health and well-being for millions of Americans. It's vitally important that patients take their medicines as prescribed by their health care provider and as indicated on the label or packaging. It's also important to be sure to store medications securely to prevent accidental ingestion or misuse by others in your household, especially children.

If you have expired or unwanted medication, proper disposal is easy. To protect your privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials before using any of the following disposal options. (Source: U.S. Food and Drug Administration)

For more information about the King County Med-Project program, please go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-Proj.

**King County MED-Project**  
Medication Education & Disposal

# MEDICATION EDUCATION & DISPOSAL

### CHECK THE PACKAGE

If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions. Do not flush drugs down the toilet unless the information on the label, package or package insert specifically instructs you to do so.



### TAKE-BACK EVENTS

Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines. The local authorities, and King County MED-Project may all sponsor local drug take-back events in your area. For information on take-back events, visit [www.med-project.org/king-county/take-back-events](http://www.med-project.org/king-county/take-back-events).



### CONVENIENT KIOSKS

Community drug drop-off sites allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal. To find the disposal kiosks in your area, visit [www.med-project.org/king-county/convenient-kiosks](http://www.med-project.org/king-county/convenient-kiosks).



### IN-HOME DISPOSAL

If no disposal instructions are given on the drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps.

1. Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs).
2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.\*
3. Alternatively, mail-back services are available to differentially-abled and home bound residents. Visit [www.med-project.com/king-county/in-home-disposal](http://www.med-project.com/king-county/in-home-disposal) to order a mail-back package.

\*Source: [www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm](http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm), last updated May 19, 2014.

*This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.*

## Appendix M *Continued*

Translations of the brochure and FAQ will be available in Spanish, Vietnamese, Mandarin, Russian, and Tagalog.

### Instruction Brochure/Flyer Mockup

# MEDICATION EDUCATION & DISPOSAL

- 1 CHECK THE PACKAGE**

If there are specific instructions for disposal on the label, package or package insert, please follow those instructions. Do not flush drugs down the toilet unless specifically instructed to do so.



Medication label mockup showing fields for NAME OF HOSPITAL/DOCTOR (DR. BLOOM), THE TABLET/CAPSULES (2), To be taken (Time daily), Before meal (AM), After meal (PM), Patient's name (JANE SMITH), and Date (8/20/15). Includes instructions: OPEN AND CLOSE HERE and Please keep out of reach of children.
- 2 TAKE-BACK EVENTS**

Local take-back events offer residents a free and convenient way to dispose of expired or unwanted medicines. [www.med-project.org/king-county/take-back-events](http://www.med-project.org/king-county/take-back-events)



Calendar for July 2015 showing dates from Sunday to Saturday. The 13th is highlighted with a red circle.
- 3 CONVENIENT KIOSKS**

To find the drop-off sites in your area, visit [www.med-project.org/king-county/convenient-kiosks](http://www.med-project.org/king-county/convenient-kiosks).



Medication disposal bin with text: DISPOSE OF YOUR DRUGS HERE
- 4 IN-HOME DISPOSAL**
  1. Remove medication from its original container and mix with an undesirable substance, such as used coffee grounds. 2. Place the mixture in a sealable bag, empty can, or other container and throw in your household trash.\*
  3. Alternatively, mail-back services are available to differentially-abled and home bound residents. Visit [www.med-project.com/king-county/in-home-disposal](http://www.med-project.com/king-county/in-home-disposal) to order a mail-back package.

Illustration showing two capsules (one pink, one purple) being mixed with coffee grounds in a small container.

\* Source: [www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm](http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm), last updated May 19, 2014.

*This material has been provided for compliance with King County Board of Health Secure Medicine Return Regulations and does not necessarily reflect the views of the Plan owner or individual producers.*

For more information about the King County Med-Project program, please go to [www.med-project.org](http://www.med-project.org) or call 1-844-MED-Proj.

**King County MED-Project**  
Medication Education & Disposal

## Appendix M *Continued*

### PSA Outline

# King County Med-Project

Medication Education & Disposal

The following is a proposed outline for a public service announcement (PSA) promoting King County MED-Project.

#### **Radio Script** (approx. :60 seconds)

The King County Medication Education & Disposal Project wants the public to know the best way to dispose of expired and unwanted medications.

First, check the label. If there are specific disposal instructions on the label, follow those. Do not flush prescription drugs down the toilet, unless the product information instructs you to do so.

Second, local drug take-back events and kiosks offer residents the option to dispose of unwanted or expired medicines.

Third, if no instructions are provided on the label and there's no take-back program in your area, you can dispose of these drugs at home by following these simple steps.

Remove the expired drugs from their original containers and mix them with an undesirable substance, like coffee grounds or kitty litter (this makes the drug less appealing to children and pets). Next place the mixture in a sealable bag, then place in a trash bag.

For more information on the MED-Project and to hear your disposal options again, visit [www.med-project.org](http://www.med-project.org) or call 1-844-MED-PROJ.

*Paid for by King County MED-Project.*

###

## Appendix M *Continued*

### PSA Outline

# King County Med-Project

Medication Education & Disposal

**TV Script** (approx. :30 seconds)

Sample Visual	Sample Audio
Open on a panning shot of several prescription drug vials or a hand removing a vial from a medicine cabinet.	VO: There are several ways to dispose of expired and unwanted medications.
Cut to a tight shot of the vial in someone's hands and the finger scans the label.	First, check the label and follow the specific disposal instructions.
Then cut to an over the shoulder shot of a person looking at a laptop and going to the website. We can show screenshot of locator on our website. Alt visual, person making a phone call.	Or check local drug take-back events and kiosks available in your area.
Cut to a person at a kitchen counter with several pill vials. Cut to person dumping the container of one vial into a plastic sealable bag with coffee grounds in it. Cut to hand sealing the bag. Cut to hand placing in a trash can.	Or dispose of expired or unwanted medications by removing them from their original container and mixing them with an undesirable substance like coffee grounds or kitty litter. Then place the mixture in a sealable bag and place in a trash bag.
Cut to white screen with black text: TEXT: For more information on the MED-Project, visit <a href="http://www.med-project.org">www.med-project.org</a> Or call 1-844-MED-PROJ (1-844-633-7765)	This message is brought to you by the King County MED-Project.

## Appendix M *Continued*

Translations of the brochure and FAQ will be available in Spanish Vietnamese, Mandarin, Russian, and Tagalog.

### FAQ Outline

The following are suggested questions to be addressed by the “Frequently Asked Questions” section of the King County MED-Project website/public relations toolkit. All text is subject to change pending review and approval.

- **What is the King County MED-Project?**  
King County MED-Project is the public, non-profit entity implementing the King County Product Stewardship Plan, including the education and outreach programming.
- **What should I do if I am having a medical emergency?**  
If you are having a medical emergency, contact emergency medical services immediately by dialing 911.
- **What should I do if I think I have ingested something poisonous?**  
If you think you have ingested something poisonous, contact emergency services immediately. Please dial 911 or contact your local poison control center.
- **What should I do if my pet has ingested medication?**  
If you believe your pet may have ingested human or animal medication not intended for consumption by your pet, please contact your veterinarian or local animal poison control hotline.
- **Whom should I call with a question about my medication?**  
Please direct all questions regarding your medication to your health care provider.
- **Where can I find information about the safe storage of medication?**  
You should follow any storage instructions provided by your healthcare provider, and any written instructions provided with your medication or listed on its packaging.

In addition, many government agencies provide information regarding safe storage of medication. Possible sources include the National Institutes of Health’s [information page](#) and the CDC’s [information page](#)

- **Can I flush my medication down the toilet?**  
Do not flush medications down the toilet unless the information on the label, package or package insert specifically instructs you to do so.
- **Should I remove my personal information before disposing of my medication?**  
Please remove all personal and identifying information from your medication labels and/or its packaging before disposal.
- **Where are the King County MED-Project disposal locations nearest me?**  
King County MED-Project is providing disposal locations throughout the King County. For more information about the location nearest to you, please visit the [“Find the Nearest Disposal Location”](#) portion of the King County MED-Project web site, or call the hotline at 1-844-MED-Proj.
- **Will it cost me anything to dispose of my expired or unwanted medications?**  
There will be no fee for medication disposal charged at the point of collection.

# Appendix M *Continued*

## FAQ Outline

- **What items can I dispose of in the King County MED-Project kiosks?**  
Prescription and non-prescription medicines in pill, capsule aerosol or liquid form may be turned in at kiosks. No illicit drugs, medical devices, or needles, herbal remedies, cosmetics or other personal care products, or pet pesticides will be accepted.
- **Will there be a take-back event in my area?**  
Please visit the King County MED-Project web site or dial the hotline at 1-844-MED-PROJ to learn about take-back events in your area.
- **I am differentially-abled or home bound and unable to go to a kiosk or attend a take-back event. How can I dispose of my expired or unwanted medicine?**  
Please dial the hotline at 1-844-MED-PROJ to request a pre-paid envelope to return your unwanted or expired medicine.
- **Where else can I find information about the safe disposal of expired or unwanted medicines?**  
Several government agencies provide information regarding safe disposal of medication. Please refer to the FDA's website for more information "[Consumer Updates: How to Dispose of Unused Medicines](#)".
- **I have a question not answered by this website. Is there someone I can contact with a question about King County MED-Project?**  
For more information, please dial the hotline at 1-844-MED-Proj.
- **What is recommended for safe disposal of expired or unwanted medicine in King County?**  
The following disposal options and sequence should be considered when disposing of unwanted medicine:

Check the Package: If there are any specific instructions for disposal on the label, package or package insert, please follow those instructions.

1. Do not flush drugs down the toilet unless the information on the package specifically instructs you to do so.

Take-Back Events: Local take-back events may be sponsored in your area and offer residents a free and convenient way to dispose of expired or unwanted medicines. Local law enforcement authorities may sponsor local drug take-back days in your area.

Convenient Kiosks: Community drug take-back locations at local law enforcement agencies allow residents to bring expired or unwanted medicines to a convenient, centralized location for proper disposal.

In-Home Disposal: If no disposal instructions are given on the drug labeling and no take-back program is available in your area, throw the drugs in the household trash following these steps.

1. Remove them from their original containers and mix them with an undesirable substance, such as used coffee grounds or kitty litter (this makes the drug less appealing to children and pets, and unrecognizable to people who may intentionally go through the trash seeking drugs).
2. Place the mixture in a sealable bag, empty can, or other container to prevent the drug from leaking or breaking out of a garbage bag.<sup>1</sup>

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<sup>1</sup> <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm101653.htm>, page last updated May 19, 2014

Sample – Not for Distribution. All text subject to change pending review and approval.

## Appendix N

### Sample Template: Take-Back Event Media Advisory



ADVISORY \*\*\* ADVISORY \*\*\* ADVISORY \*\*\* ADVISORY

King County MED-Project to Support King Take-Back Event on [Date, 2016]

King County residents are invited to bring  
expired or unwanted medications to  
[Location] from [x time] to [y time] for disposal

King County, Washington, [Date] – The King County Medication Education & Disposal Project (King County MED-Project), a consumer education campaign dedicated to responsible medication use and disposal, announced today that it will be supporting a medication take-back event supervised by a local law enforcement agency for consumers in [town] on [date]. All King County residents are invited to bring their expired or unwanted medications for disposal. The service is free. [Insert information for residents about what can be collected]. To protect privacy, consumers are reminded to remove all personally identifiable information on prescription labels or materials which are brought to this take-back event.

What: King County MED-Project Medication Take-Back Event – bring your expired or unwanted medicines for disposal

When: [Date], [Time]

Where: [Location]

For more information about disposal options for expired or Unwanted Medicine, visit [www.med-project.org](http://www.med-project.org).

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Contact:

King County MED-Project Public Affairs 202-xxx-xxxx

