

From: [Aldred, Kristin](#)
To: [Major, Erica \(BOS\)](#)
Subject: Comment on 230156, Version 1 - Environment Code - Safe Drug Disposal
Date: Wednesday, March 29, 2023 11:49:39 AM
Attachments: [image001.png](#)
[San Fran pharm incin comment 20230329.pdf](#)

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Good afternoon Erica,

Stericycle would like to submit the attached comment letter for File #230156, an amendment to the Safe Drug Disposal Ordinance.

Please let me know if you have any questions or if you need additional information to add the comment to the file for consideration.

Thank you very much,
Kristin

Kristin Aldred, PhD (she/her)
Director Government Affairs

M 603.519.1086 | kristin.aldred@stericycle.com

stericycle.com



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We protect what matters.

March 29, 2023

Land Use and Transportation Committee
Board of Supervisors
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: File No. 230156

Supervisors Melgar, Preston and Peskin:

Stericycle, Inc. (Stericycle) appreciates the opportunity to provide comments on the ordinance amending the Environment Code – Safe Drug Disposal to expand the types of facilities that can treat drugs collected under the program.

Stericycle is a U.S.-based business-to-business services company and a leading provider of compliance-based solutions that protect people and brands, promote health and well-being and safeguard the environment. Among its solutions, Stericycle provides pharmaceutical waste disposal services to healthcare facilities. Stericycle also offers drug disposal options for consumer-generated waste, including MedDrop medication collection kiosks and Seal&Send consumer medication mail back envelopes. In this regard, Stericycle is registered with the U.S. Drug Enforcement Administration as a Reverse Distributor-Collector pursuant to 21 CFR Parts 1301 and 1317.

Stericycle welcomes and supports the Board's proposal to remove the requirement that covered drugs be disposed of at a hazardous waste disposal facility and instead allow the drugs to be treated at waste facilities operating in compliance with applicable regulatory requirements, including Hospital, Medical, and Infectious Waste Incinerators (HMIWI). Stericycle operates a national network of HMIWIs and currently accepts unused or unwanted medications collected from individuals via mail-back programs, take-back events and/or collection receptacles (kiosks) at one of our facilities. HMIWI are subject to stringent emissions standards under Title V of the Clean Air Act and can accept and effectively treat household waste pharmaceuticals, including those collected under drug take back programs throughout the U.S.

We appreciate your consideration of these comments. Please do not hesitate to contact me at (603) 519-1086 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristin Aldred".

Kristin Aldred, PhD
Director Government Affairs
Stericycle, Inc.

From: [Graziotto, Rachael](#)
To: [Major, Erica \(BOS\)](#)
Cc: [Henderson, Scott](#); [Willard, R Scott](#); [McNaughton, Ethan](#)
Subject: File# 230156 V:1 Environment Code- Safe Drug Disposal - Comment
Date: Monday, March 13, 2023 12:33:40 PM
Attachments: [image001.png](#)

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Hello Erica,

Covanta would like to contribute the following comment to the revision to file number: 230156.

“Covanta receives and processes post-consumer pharmaceutical collections from across California and the country. This amended regulation will provide more options for where this material will be properly destroyed. By allowing PROs the freedom to use alternative ultimate destruction such as a Municipal Solid Waste Combustor, it enables consistent, timely destruction via a wider array of assets across the United States.”

Please advise if you need further information in order to have this comment included and considered with the ordinance.

Thank you kindly,

Rachael Graziotto

COVANTA

Email: rgraziotto@covanta.com
<http://covantaes.com>

Our mission is to ensure no waste is ever wasted.

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