



This summary shows the most recent updates first.

Date	Description of Update	Notes
Requested 07-24-2024  Approved 10-01-2025	<p><b>Added</b> DEA Reverse Distributor</p> <p>123 Compliant Logistics, LLC 7106 W Will D. Alton Ln, Ste. 104 Spokane, WA 99224-5761</p>	<p>Inmar mailers must not be destroyed by the City of Spokane Waste-to-Energy Facility until the DEA has granted an exception to 123 Compliant Logistics, LLC in Spokane WA that allows this.</p>
	<p><b>Added</b> disposal facility for all collected medication (kiosk liners and mailers).</p> <p>City of Spokane Waste-to-Energy Facility 2900 S Geiger Blvd Spokane, WA 99224</p>	<p>Inmar will provide the department a copy of this DEA exception letter.</p>
	<p>Collected medication shipped to 123 Compliant in Spokane Washington will be received, scanned, and weighed using the same process currently used at 123 Compliant’s Phoenix location. Two 123 Compliant employees will transport collected medication to the City of Spokane Waste-to-Energy Facility for witnessed destruction that complies with federal DEA requirements.</p>	<p>Inmar will provide the department a copy of this DEA exception letter.</p>
	<p><b>Revised</b> first and third paragraphs of Disposal of Covered Drugs, Kiosk Liners section (bottom of page 22 of 05-05-2022 approved plan) as follows:</p> <p>I. Disposal of Covered Drugs Kiosk Liners</p> <p>As described in Section II.D, Inmar staff will conduct all technician-assisted returns from Kiosks. Authorized Collectors may also choose to manage the returns process on their own. In both of these return options, Packaged Containers are properly sealed, securely stored, and pick-up is arranged from the Collection Site in a manner consistent with the DEA Rule. The Packaged Container will include a pre-addressed and pre-paid shipping label. In accordance with RCW 69.48.080, the common carrier FedEx representative will take possession of the Packaged Container and deliver it to <del>123 Compliant Logistics, LLC in Phoenix, AZ</del> an DEA Reverse Distributor approved in this plan for witnessed transportation to witnessed incineration.</p> <p><del>123 Compliant Logistics, LLC</del> Inmar’s approved DEA Reverse Distributors operates in full compliance with DEA § 1317.75(c), which prohibits handling substances after they have been deposited into a Kiosk.</p> <p>From Reverse Distributors, <del>All</del> Packaged Containers <del>shipped directly to 123 Compliant Logistics, LLC in Phoenix, AZ</del> will be transported to an approved disposal facility for witnessed destruction using <del>their contracted, licensed approved hazardous waste transporters, or to an adjacent approved disposal facility for witnessed destruction by two employees of the reverse distributor., TransChem Environmental to the appropriate disposal facility</del> <del>to All Packaged Containers</del> will be incinerated quickly, securely, efficiently, and in accordance with all DEA requirements. <del>123 Compliant Logistics, LLC</del></p>	



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	<p><b>Reverse distributors</b> will be responsible for all DEA Form 41 recordkeeping requirements.</p> <p><b>Revised</b> Mail-Back Envelopes and Packages section (changed from 07-03-23 revision) as shown below:</p> <p>Mail-Back Envelopes and Packages</p> <p>All Mailers will be received by Inmar’s approved DEA Reverse Distributors and will be transported <b>to an approved disposal facility via common carrier</b> for witnessed incineration <b>using approved hazardous waste transporters, or to an adjacent approved disposal facility for witnessed destruction by two employees of the reverse distributor. at one of Inmar’s approved disposal vendors.</b> Inmar’s Reverse Distributor(s) has DEA approval to provide destruction of Mailers off-site and a copy of the DEA exception letter has been provided to DOH.</p> <p><b>Deleted</b> “All covered drugs” from Service Provider table and revised Service Providers description above table as follows (page 26 of 05-05-2022 approved plan):</p> <p>Service Providers</p> <p>The following is a list of Service Providers who will be providing transportation and disposal to fulfill the requirements of this Plan. <b>All Service Providers meet requirements for handling all Covered Drugs.</b></p> <p><b>Updated</b> service provider information for clarity.</p> <p>A full list of Inmar Service Providers and the services they provide is below.</p> <table border="1" data-bbox="297 1245 1193 1917"> <thead> <tr> <th data-bbox="297 1245 727 1283">Company</th> <th data-bbox="727 1245 1193 1283">Services provided</th> </tr> </thead> <tbody> <tr> <td data-bbox="297 1283 727 1415">123 Compliant Logistics, LLC 7106 W Will D. Alton Ln, Ste. 104 Spokane, WA 99224-5761</td> <td data-bbox="727 1283 1193 1415">Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction not yet approved)</td> </tr> <tr> <td data-bbox="297 1415 727 1583">123 Compliant Logistics, LLC 2626 N 29th Avenue Phoenix, AZ 85009</td> <td data-bbox="727 1415 1193 1583">Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction expires 10-10-2026)</td> </tr> <tr> <td data-bbox="297 1583 727 1724">Covanta Environmental Solutions DBA Chesapeake Waste Solutions 190 Shellyland Rd Manheim PA 17545</td> <td data-bbox="727 1583 1193 1724">Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction expires 03-31-26)</td> </tr> <tr> <td data-bbox="297 1724 727 1885">Covanta Environmental Solutions, LLC 2515 S. Holt Road Suite 200 Indianapolis, IN 46241</td> <td data-bbox="727 1724 1193 1885">Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction expires 03-31-26)</td> </tr> <tr> <td data-bbox="297 1885 727 1917">Clean Harbors Aragonite</td> <td data-bbox="727 1885 1193 1917">Hazardous waste incinerator</td> </tr> </tbody> </table>	Company	Services provided	123 Compliant Logistics, LLC 7106 W Will D. Alton Ln, Ste. 104 Spokane, WA 99224-5761	Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction not yet approved)	123 Compliant Logistics, LLC 2626 N 29th Avenue Phoenix, AZ 85009	Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction expires 10-10-2026)	Covanta Environmental Solutions DBA Chesapeake Waste Solutions 190 Shellyland Rd Manheim PA 17545	Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction expires 03-31-26)	Covanta Environmental Solutions, LLC 2515 S. Holt Road Suite 200 Indianapolis, IN 46241	Reverse distributor Receives packaged containers and mailers (DEA exception for off-site mailer destruction expires 03-31-26)	Clean Harbors Aragonite	Hazardous waste incinerator	
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Clean Harbors Aragonite	Hazardous waste incinerator													



**Summary of updates to [Inmar approved plan](#) dated May 5, 2022**

Date	Description of Update	Notes
	11600 N Aptus Road Aragonite, UT 94029	Destroys packaged containers
	Clean Harbors El Dorado, LLC 309 American Circle El Dorado, AR 71730	Hazardous waste incinerator Destroys packaged containers Destroys mailers
	Ross Incineration Services 36790 Giles Road Grafton, OH 44044	Hazardous waste incinerator Destroys packaged containers Destroys mailers
	Veolia ES Technical Solutions, LLC 7665 Highway 73 Port Arthur, TX 77640	Hazardous waste incinerator Destroys packaged containers Destroys mailers
	Barron County Waste to Energy and Recycling Facility 585 10 ½ Ave Almena, WI 54805	Municipal waste combustor/waste to energy Destroys packaged containers Destroys mailers from 123 Compliant Logistics in Phoenix AZ
	City of Spokane Waste-to-Energy Facility 2900 S Geiger Blvd Spokane, WA 99224	Municipal waste combustor/waste to energy Destroys packaged containers Destroys mailers from 123 Compliant Logistics in Spokane WA
	Indianapolis Resource Recovery Facility 2320 South Harding Street Indianapolis IN 46221	Municipal waste combustor/waste to energy Destroys packaged containers Destroys mailers from Covanta Environmental Solutions
	Lancaster County Waste-To-Energy Facility 1911 River Road Bainbridge, PA 17502	Municipal waste combustor/waste to energy Destroys packaged containers Destroys mailers from rom Covanta Environmental Solutions
	Curtis Bay Medical Waste Services 3200 Hawkins Point Rd Baltimore City, MD 21226	Medical waste incinerator Destroys packaged containers Destroys mailers from Covanta Environmental Solutions
	ReWorld Huntsville, Inc. 5251 Triana Boulevard SW Huntsville, AL 35805	Medical waste incinerator Destroys packaged containers Destroys mailers from Covanta Environmental Solutions
	TransChem Environmental 542 East 27 <sup>th</sup> Street Tucson, AZ 85713	Hazardous waste transporter Packaged containers and mailers
	FedEx	Common carrier Packaged containers
	USPS	Common carrier Packaged containers and mailers



Date	Description of Update	Notes												
	TForce Freight, Inc. 1000 Semmes Avenue Po Box 1216 Richmond, Va 23218-1216	Common carrier <b>Packaged containers and mailers</b>												
	Schneider National Carriers Inc. 3101 South Packerland Dr Green Bay, WI 54313	Common carrier <b>Packaged containers and mailers</b>												
	Saia Motor Freight Line LLC 11465 Johns Creek PKWY Suite 400 Johns Creek, GA 30097	Common carrier <b>Packaged containers and mailers</b>												
	Covanta Environmental Solutions Carriers II, LLC 5300 N 33rd Street Milwaukee, WI 53209	Transporter <b>Packaged containers and mailers</b>												
	Doncin Transport, Inc. 3478 Sunnyside Road Manheim, PA 17545	Transporter <b>Packaged containers and mailers</b>												
	EMS Dispatch Inc. 316 W. Mount Vernon St. Lansdale, PA 19446	Transporter <b>Packaged containers and mailers</b>												
Requested 07-01-2025  Approved 07-08-2025	<p><b>Updated</b> service provider information to show Curtis Bay Medical Waste Services in Baltimore City rather than Baltimore and changing name of entity located at 5251 Triana Boulevard SW in Huntsville, Alabama, from Covanta Huntsville, Inc. to ReWorld Huntsville, Inc.</p> <p>A full list of Inmar Service Providers and the services they provide is below. The contact and registration information associated with each has not changed, so is not included below.</p> <table border="1" data-bbox="300 1325 1185 1898"> <thead> <tr> <th data-bbox="300 1325 743 1360">Company Name</th> <th data-bbox="743 1325 1185 1360">Service Provided</th> </tr> </thead> <tbody> <tr> <td data-bbox="300 1360 743 1465">               123 Compliant Logistics, LLC                2626 N 29th Avenue                Phoenix, AZ 85009             </td> <td data-bbox="743 1360 1185 1465">               Reverse Distributor                All covered drugs                Receives Mailers             </td> </tr> <tr> <td data-bbox="300 1465 743 1602">               Covanta Environmental Solutions                DBA Chesapeake Waste Solutions                190 Shellyland Rd                Manheim PA 17545             </td> <td data-bbox="743 1465 1185 1602">               Reverse Distributor                All covered drugs                Receives Mailers             </td> </tr> <tr> <td data-bbox="300 1602 743 1707">               Covanta Environmental Solutions, LLC                2515 S. Holt Road Suite 200                Indianapolis, IN 46241             </td> <td data-bbox="743 1602 1185 1707">               Reverse Distributor                All covered drugs                Receives Mailers             </td> </tr> <tr> <td data-bbox="300 1707 743 1812">               Clean Harbors Aragonite                11600 N Aptus Road                Aragonite, UT 94029             </td> <td data-bbox="743 1707 1185 1812">               Hazardous Waste Incinerator                All covered drugs                Destroys mailers             </td> </tr> <tr> <td data-bbox="300 1812 743 1898">               Clean Harbors ElDorado, LLC                309 American Circle                ElDorado, AR 71730             </td> <td data-bbox="743 1812 1185 1898">               Hazardous Waste Incinerator                All covered drugs                Destroys mailers             </td> </tr> </tbody> </table>	Company Name	Service Provided	123 Compliant Logistics, LLC 2626 N 29th Avenue Phoenix, AZ 85009	Reverse Distributor All covered drugs Receives Mailers	Covanta Environmental Solutions DBA Chesapeake Waste Solutions 190 Shellyland Rd Manheim PA 17545	Reverse Distributor All covered drugs Receives Mailers	Covanta Environmental Solutions, LLC 2515 S. Holt Road Suite 200 Indianapolis, IN 46241	Reverse Distributor All covered drugs Receives Mailers	Clean Harbors Aragonite 11600 N Aptus Road Aragonite, UT 94029	Hazardous Waste Incinerator All covered drugs Destroys mailers	Clean Harbors ElDorado, LLC 309 American Circle ElDorado, AR 71730	Hazardous Waste Incinerator All covered drugs Destroys mailers	
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	Veolia ES Technical Solutions, LLC 7665 Highway 73 Port Arthur, TX 77640	Hazardous Waste Incinerator All covered drugs Destroys mailers	
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	Indianapolis Resource Recovery Facility 2320 South Harding Street Indianapolis IN 46221	Municipal Waste Combustor/Waste to Energy All covered drugs Destroys mailers	
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	TForce Freight, Inc. 1000 Semmes Avenue Po Box 1216 Richmond, Va 23218-1216	Common Carrier All covered drugs	
	Schneider National Carriers Inc. 3101 South Packerland Dr Green Bay, Wi 54313	Common Carrier All covered drugs	
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	<p>Doncin Transport, Inc. 3478 Sunnyside Road Manheim, PA 17545</p> <p>Transporter All covered drugs</p> <hr/> <p>EMS Dispatch Inc. 316 W. Mount Vernon St. Lansdale, PA 19446</p> <p>Transporter All covered drugs</p> <p><b>Included an additional vendor</b> as supplier of all three types of mailers.</p> <p>American RX Group, LLC 1010 Summit Avenue N Sauk Rapids, MN 56379</p> <ul style="list-style-type: none"> <li>• Specifications for mailers for sharps that contain medication will not change.</li> <li>• Mailers for general medication and for inhalers will be approximately 7.75 x 11.5 inches which is slightly larger than mailers from other vendors.</li> </ul> <p>All mailers will continue to meet all DEA requirements as described in approved plan.</p>	
<p>Notification 06-05-2025</p>	<p>Changed official point of contact from Nick Massaro to Adam Grant.</p>	
<p>Requested 04-05-2024</p> <p>Approved 04-05-2024</p>	<p>Replaced injector mailer package's 1.4 qt container described on page 22, with a 1.5 qt container that accommodates larger injectors. All other components of the injector mailer package remain unchanged.</p>	
<p>Requested 05-05-2023</p> <p>Approved 07-03-2023</p>	<p><b>Revised</b> first paragraph of Mailer Tracking section (last paragraph on page 22 of 05-05-2022 approved plan) as shown below.</p> <p>All mailers, whether they are distributed from a mail-back distribution location or from the program website and program toll-free number, <b>are shipped back to Covanta for destruction and</b> will have a unique, serialized identification number. Mailers distributed directly to covered entities via the program website or program toll-free phone number requests will be tracked by Inmar when sent to covered entities and tracked through receipt for final destruction at <b>Covanta</b> Inmar's approved DEA Reverse Distributor(s) to final destruction at the destruction facility.</p>	<p>Covanta Environmental Solutions and 123 Compliant Logistics (reverse distributors) are the only service providers that receive mailers.</p> <p>The department received copies of DEA letters granting Covanta</p>



Summary of updates to [Inmar approved plan](#) dated May 5, 2022

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	<p><b>Revised</b> Mail-Back Envelopes and Packages section (top of page 26 of 05-05-2022 approved plan) as shown below:</p> <p>Mail-Back Envelopes and Packages</p> <p>All Mailers will be received by Inmar’s approved DEA Reverse Distributors <del>at Covanta in Indianapolis, IN</del> and will be <del>incinerated on-site</del> transported via common carrier for witnessed incineration at one of Inmar’s approved disposal vendors. Inmar’s Reverse Distributor(s) has DEA approval to provide destruction of Mailers off-site and a copy of the DEA exception letter has been provided to DOH.</p> <p><b>Added note</b> to Service Provider section (page 26 of 05-05-2022 approved plan) as follows:</p> <p><b>Note:</b> Each reverse distributor(s) that is approved to receive mailers also holds an exception to Title 21 CFR 1317.70(a) from DEA which permits them to operate a mail-back program absent an on-site method of destruction. Copies of these DEA exception letters are being provided as an attachment.</p> <p><b>Updated</b> Service Provider table with new service providers highlighted.</p>	<p>Environmental Solutions and 123 Compliant Logistics temporary exemptions from 1317.70(a).</p>																																
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	36790 Giles Road Grafton, OH 44044	440-748-5800	Title V Permit: P0108010	Incinerator- All covered drugs  Destroys mailers
	Indianapolis Resource Recovery Facility 2320 South Harding Street Indianapolis IN 46221	317-378-8723	EPA ID: IND984882365  Title V Permit: T097- 40864-00123	Municipal Waste Combustor/Waste to Energy – All Covered Drugs  Destroys Mailers
	Lancaster County Waste-To-Energy Facility 1911 River Road Bainbridge, PA 17502	Michael Groff 717-735-0171	EPA ID: PA0000103713	Municipal Waste Combustor/Waste to Energy – All Covered Drugs  Destroys Mailers
	Barron County Waste to Energy and Recycling Facility 585 10 1/2 Ave Almena, WI 54805	715-637-6882	WI Air Pollution Control Permit: 60304904A-P21	Municipal Waste Combustor/Waste to Energy – All Covered Drugs  Destroys Mailers
	Covanta Huntsville, Inc. 5251 Triana Boulevard SW Huntsville, AL 35805	256-882-1019	EPA ID: AL0000266726  Title V Permit: AL0000000108900104	Medical Waste Incinerator – All Covered Drugs  Destroys Mailers
	Curtis Bay Medical Waste Services 3200 Hawkins Point Rd Baltimore, MD 21226	Sam Blanchard 855-228-1715	EPA ID: MDD985404318	Medical Waste Incinerator – All Covered Drugs  Destroys Mailers
	TransChem Environmental 542 East 27 <sup>th</sup> Street Tucson, AZ 85713	520-829-5651	DOT Registration: 052119550060B  Hazardous materials safety permit: US- 1341480-AZ-HMSP	Hazardous Waste Transporter - All Covered Drugs
	FedEx	336-406-8332	FedEx Express DOT ID: 86876  FedEx Ground DOT ID: 265752	Common Carrier – Packaged containers
	USPS	Jackie Purcell 919-501-9394	NA	Common Carrier All mailers and containers
	TForce Freight, Inc. 1000 Semmes Avenue Po Box 1216 Richmond, Va 23218-1216	800-333-7400	US DOT ID: 121058  Hazmat Reg: 052421550207DF	Common Carrier All Covered Drugs
	Schneider National Carriers Inc. 3101 South Packerland Dr Green Bay, WI 54313	800-558-6767	US DOT IS: 26184  Hazmat Reg: 060922550094EG	Common Carrier All Covered Drugs
	Saia Motor Freight Line LLC 11465 Johns Creek PKWY Suite 400 Johns Creek, GA 30097	800-765-7242	US DOT ID: 29124  Hazmat Reg: 025721550039DF	Common Carrier All Covered Drugs



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	Covanta Environmental Solutions Carriers II, LLC 5300 N 33rd Street Milwaukee, WI 53209	Red Landis 336-683-0809	USDOT: 508337  Hazmat Reg: 051021550085DF	Transporter All Covered Drugs	
	Doncin Transport, Inc. 3478 Sunnyside Road Manheim, PA 17545	Donald Heistand 717-689-5129	USDOT: 1625457	Transporter All Covered Drugs	
	EMS Dispatch Inc. 316 W. Mount Vernon St. Lansdale, PA 19446	David Chapman 215-669-4253	USDOT: 743959	Transporter All Covered Drugs	
Requested 04-13-2023  Approved 04-17-2023	<p><b>Fixed math error</b> in 180 days after plan approval collection goal, page 38.</p> <p>Last paragraph of section V. Goals, Collection, 180 days after plan approval is changed as follows:</p> <p>Inmar sets a collection goal (for Collection Sites) of 20 pounds per month per collection site for a total of 3,880 pounds of Covered Drugs collected from 194 Kiosks monthly and <del>46,500</del> 23,280 pounds in the first 180 days after Plan approval.</p>				<p>Approved plan accurately describes monthly estimated collection amount (3,880 pounds) but inaccurately describes 180 day collection goal as 46,560 rather than 23,280 pounds. 180 days is approximately six months. 3,3880 multiplied by 6 equals 23,280.</p>
Requested 03-27-2023  Approved 07-07-2023	<p><b>Request</b> to provide medication mail-back mailers directly to households as supplemental service in population centers where Inmar hasn't yet provided collection kiosks or mailer distributors.</p> <p>Households in the Elmer City, Krupp, Lamont, and Lyman population centers will receive medication return mailers. Inmar expects to provide mailers to 579 households.</p>				<p>Approval is for calendar year 2023 only.</p>