



April 21, 2023

Representative Rob Nosse,  
Chair Representative Christine Goodwin,  
Vice-Chair Representative  
Travis Nelson, Vice-Chair  
House Committee on Behavioral  
Health and Health Care Oregon State Legislature  
900 Court St. NE, HR F Salem, OR 97301

Re: SB 411 - Foundation's support

Dear Chair Nosse, Vice Chair Nelson and Members of the Committee,

The Foundation supports SB411 for the addition of methods of incineration to ORS 459A.224. As an approved program operator since June of 2021, Drug Take Back Solutions Foundation currently provides over 160 kiosk locations across the state in addition to mail back services for Oregonians to return unwanted or unused medications.

EPA acknowledged in the preamble of the Pharmaceutical Rule that both Hospital Medical Infectious Waste Incinerators ("HMIWIs") and Commercial Industrial Solid Waste Incinerators ("CISWIs") meet EPA's emission limits and are acceptable methods of incineration for drugs collected during DEA take back events.

*"In addition to complying with emission limitations, solid waste incineration units are also subject to comprehensive operating, monitoring and reporting requirements. In light of the common framework used to develop emission limits and requirements for MWC, CISWI, and HMIWI units, we believe that it is appropriate to include HMIWIs and CISWIs as types of combustors that are allowed to burn the pharmaceuticals from take-back events."*<sup>1</sup>

Modifying the existing state regulation to allow for additional methods of incineration for these drugs that meet EPA and DEA regulations and requirements will provide much needed relief in a waste industry that is already substantially challenged with a destruction backlog.

We appreciate the opportunity to submit our testimony in support of SB411.

Regards,



Christopher L. Smith, R.Ph (Apr 21, 2023 17:56 EDT)

Chris Smith  
President

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<sup>1</sup> Federal Register/Vol. 84, No. 36/Friday, February 22, 2019/Rules and Regulations







# SB411 support

Final Audit Report

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