
Subject	City of Waukesha Pharmaceutical and Personal Care Products Reduction Program		
Client	City of Waukesha	Date	May 13, 2021
Project	Waukesha Water Utility (WWU) Great Lakes Water Supply Program		
Project No.	D3235900		

The City of Waukesha (City) received approval of its application for diverting Lake Michigan water with return flow on June 24, 2016 (Application Approval). As a condition of the Application Approval, the City is required to implement a Pharmaceutical and Personal Care Products (PPCP) Reduction Program prior to the diversion commencing. The specific requirement of Condition G of the Application Approval includes:

***Pharmaceutical and Personal Care Products Recycling and Impacts.** The Applicant [City of Waukesha] must implement a comprehensive pharmaceutical and personal care products recycling program and continually use the best available methods to encourage the further reduction of such products into the wastewater as recommended by the Originating Party [Wisconsin Department of Natural Resources].*

The purpose of this document is to summarize the City's plan for complying with Condition G.

1. Background

The City operates the Clean Water Plant (CWP) to provide wastewater treatment to the City residents and a small number of surrounding residential areas. There are various existing programs required as part of the CWP discharge permit that reduce volume and constituents in the wastewater conveyed to the CWP. These programs include an inflow and infiltration reduction program to reduce clear-water in the sewers, a pretreatment program for industrial and commercial users, a mercury reduction program that includes school and dental office mercury reduction and recovery, and a chloride reduction program that includes source reduction for salt use through water softeners and road/sidewalk deicing. The CWP has also partnered for several years with the City's engineering and Department of Public Works (DPW), the police department, and Waukesha County to coordinate efforts related to PPCP reduction. The current PPCP reduction programs by the City include:

Medication Disposal Collection Boxes or Kiosks at the following locations:

- Waukesha Police Department front lobby located at 1901 Delafield Street, Waukesha.
- Waukesha County Sheriff's Department lobby at 515 W. Moreland Boulevard, Waukesha.
- Waukesha Memorial Hospital pharmacy located at 725 American Avenue, Waukesha.
- Walgreens located at 221 E Sunset Drive, Waukesha.
- CVS located at 130 W. Sunset Drive, Waukesha.
- Meijer pharmacy located at 801 E Sunset Drive, Waukesha.

National Prescription Drug Take Back Day Collection Events (twice per year):

- Waukesha Police Department
- Waukesha County Sheriff

Public Education:

- Provides "FAQs" on CWP website regarding proper disposal of unwanted prescription medications with a link to the City police department's drug disposal program.
- City police department website promotes their collection box.
- Waukesha County Sheriff website promotes their collection box.
- Collection event publicity by City and County.

The City will expand their PPCP Reduction Program focusing on source reduction through education, collection, and collaboration as described herein. An anticipated schedule for completing the tasks is summarized below for each program element.

2. Source Reduction Through Education

Public education is an important element of the Program to prevent PPCP from entering the wastewater collection system. By March 1, 2022 the City will implement PPCP source reduction through public education using the following activities:

- Include resource information on City websites, including the CWP, DPW solid waste and recycling, and the police department. Resource information will include topics such as:
 - frequently asked questions;
 - disposal best practices;
 - disposal prohibitions such as never disposing of PPCP in a drain or toilet;
 - permanent collection and drop-off locations;
 - links for additional resources such as Wisconsin Department of Natural Resources and the Product Stewardship Institute;
 - collection and drop-off events;
 - encouraging full use of personal care products (PCP) to minimize product requiring disposal and to reduce purchase of replacement product as a means to achieve source reduction;
 - information regarding the benefits to water quality to the receiving waters; and
 - City contact information for residents to provide comments on the Reduction Program.

Update as appropriate.

- Utilize the community messaging board on the City's website homepage to include local PPCP collection opportunities. *Complete before collection events.*
- Periodically publish PPCP best-practices and frequently asked questions in DPW newsletter.
- Create periodic fliers for PPCP best practices and frequently asked questions for inclusion in water and sewer bills.
- Utilize other relevant communication tools, such as social media, to educate the public of PPCP collection events. *Complete before collection events.*

3. Source Reduction Through Collection and Reuse

Publicizing pharmaceutical collection opportunities that include continuous drop-off opportunities, such as the police department, or specific drop-off events, will be an important element of the Reduction Program. The City will implement source reduction through pharmaceutical collection using the following activities:

- Promote the pharmaceutical collection location at the police department through media such as newsletters, utility bill mailings, and the City's police and CWP webpage and emails. *Implement by March 1, 2022 and repeat or update as appropriate.*
- Promote pharmacy collection (e.g. Walgreens) through media such as newsletters, utility bill mailings, and the City's webpage, emails and social media. *Implement by March 1, 2022 and repeat or update as appropriate.*
- Coordinate with other entities to promote pharmaceutical drop-off events, such as with the County household hazardous waste collection events, specific events at the police and sheriff departments, or specific community events sponsored by the City (e.g. Earth Day events, farmers markets, festivals, summer music festivals, etc.). *Implement by March 1, 2023 and repeat as appropriate.*
- Promote PCP reuse opportunities available to City residents. *Implement by March 1, 2023 and repeat as appropriate.*

4. Source Reduction Through Collaboration

The City will implement PPCP source reduction through collaboration with existing programs and initiatives by March 1, 2023 using the following activities:

- Develop educational materials that stress the importance of proper disposal of PPCP for significant PPCP sources in the City, such as hospitals, clinics, nursing homes, veterinary clinics, pharmacies, agribusiness if applicable, and hotels. *Repeat as appropriate.*
- Collaborate with local pharmacies to promote increasing the number of collection locations. This will entail contacting pharmacies within the City that do not currently have unused drug drop off programs to see if they could add this service. *Repeat when additional pharmacies open.*
- Obtain resource materials from the WI Pharmaceutical Waste Working Group, through participating in webinars or reviewing literature provided through an email distribution, for consideration in adaptively managing the PPCP program. *Repeat every other year to determine if new information is available.*
- Sign-up for email lists and complete an annual review of the WDNR, Product Stewardship Institute, and other similar websites to obtain resource materials for consideration in adaptively managing the PPCP program.
- Coordinate with County and sheriff's department for updating their public communication platforms, such as websites and social media, with updated information and events within the City. *Repeat as appropriate.*
- Collaborate with potentially significant sources of PCP in the City to identify opportunities for source reduction, reuse, and safe disposal. This may entail contacting hotels/motels within the CWP service area to discuss how personal care products such as unused soap, shampoo, and lotion are managed. *Repeat as appropriate.*
- Identify local opportunities for donating unopened PCP (e.g., to shelters). *Repeat as appropriate.*

5. Reporting and Updating the Program

The City will provide program updates from the past year as part of the annual reporting required for the diversion. The annual report will consist of proposed changes to the program including additional tasks, schedule revisions, and appropriate deletions. The City will review the program during its annual reporting to identify areas where the program could be modified as appropriate. The program will be adaptively managed to reduce PPCP in the wastewater for the City's specific demographics.