### **SOPs for Waste Disposal and Sanitation**

### **OVERVIEW**

This Waste Disposal and Sanitation SOP describes Tambre's processes for disposing of cannabis items and maintaining a sanitary and safe environment for employees at the retail facility. This Plan directly addresses N.J.A.C. §17:30-9.14 "Destruction of Cannabis" requirements for Class 5 Retail License holders, as well as the general waste and sanitation requirements for new businesses established by the New Jersey Public Employees' Occupational Safety and Health (PEOSH) standards. The goals of this Waste Disposal and Sanitation SOP are as follows:

- To accurately track and record the amount of any destroyed or disposed cannabis items;
- To ensure that all cannabis waste is properly secured, reducing or completely preventing opportunities for diversion;
- To meet all local, state, and federal requirements for disposing of liquid and solid waste;
- To ensure the safety of all employees by requiring all personnel to follow detailed, proven standard operating procedures (SOPs) for waste disposal and general housekeeping; and
- To provide a safe workplace adhering to all state and federal requirements for sanitation.

This plan will be documented within the Operations Manual, which will be maintained on the premises, as per N.J.A.C. §17:30-9.6. All cannabis disposal and general sanitation procedures will be detailed in clear and sequential language within the manual, and employees will be trained on procedures pertinent to their job duties.

In accordance with N.J.A.C. §17:30-9.4(k)(1), Tambre will implement a waste reduction plan to increase sustainability in its operations, which may include recycling and utilizing waste compactors for non-cannabis waste. Disposal of non-cannabis waste will be conducted in accordance with the laws and commercial trash collection services of the City.

Within 30 days of employment and annually thereafter, all individuals requiring training will complete at least eight hours of onsite or online training courses per N.J.A.C. §17:30-9.8(a). Per N.J.A.C. §17:30-9.8(b), topics will include state and federal laws regarding cannabis; state and federal laws regarding privacy and confidentiality; informational developments in the field of cannabis; the proper use of security measures and controls that have been adopted; and specific procedural instructions for responding to an emergency, including a robbery or workplace violence.

#### OSHA GUIDELINES AND COMPLIANCE

Per N.J.A.C. §17:30-9.4(i), Tambre will be committed to providing a safe and sanitary working environment for its personnel. Tambre will enter into an on-site consultation agreement with the Occupational Safety and Health On-Site Consultation Program maintained by PEOSH. Through participation in the State's free Consultation Program, Tambre will receive assistance in complying with the PEOSH requirements for workplace safety and sanitation. The program will assist in:

- Identify potential hazards at the worksite;
- Create standard operating procedures to meet the regulations;
- Improve existing occupational safety and health management systems;
- Arrange safety and health and wellness training; and
- Get qualified for a safety recognition award.

Additionally, to fully commit to the safety of its employees, Tambre will participate in the Safety & Health Achievement Recognition Program (SHARP), a certification program that small businesses may utilize, which acknowledges their achievement as an exemplary model for worksite safety and health.

When possible, Tambre will follow OSHA's guidance for retail operations and workers to prevent the spread of COVID-19. This may include installing plexiglass partitions at consumer service windows and cash register lanes to create physical barriers between employees and consumers. Tambre may also create staff schedules with regular breaks so that employees can frequently wash their hands. Employees will be instructed to wash their hands with soap and water for at least 20 seconds and use an alcohol-based hand sanitizer with at least 60% alcohol.

Tambre will utilize two separate Lobbies (Outer Lobby Waiting and Waiting) to regulate the capacity of the Customer Sales Area and may use signage and rope-and-stanchion systems or similar to prevent consumers from queueing or congregating near work areas.

In accordance with OSHA guidance, Tambre will establish protocols and provide supplies to disinfect frequently-touched surfaces in workspaces and areas with consumer access, such as points-of-sale areas, the Lobbies, the Customer Sales Area, lavatories, and doors used for consumer ingress and egress.

Employees will be instructed to wipe down terminals and pens/styluses in the point-of-sales area in between each consumer, as well as any ATMs on the premises, when feasible. Employees will also wipe down employee-facing touch screens, keyboards, electronic age verification devices, or other equipment at least as often as employees change workstations. Additionally, employees will frequently clean push bars and handles on any doors that do not open automatically throughout the facility.

# CANNABIS WASTE DISPOSAL AND WASTE HANDLING PROCEDURES

#### Overview

Cannabis items may need to be disposed of for several reasons, including becoming damaged, deteriorated, contaminated, expired; or because the cannabis item containers have been opened or breached. Additionally, cannabis items may need to be disposed of if any damaged, defective, expired, or adulterated cannabis is found during inventory counts, as per N.J.A.C. §17:30-9.13(a)(2)(i).

In accordance with N.J.A.C. §17:30-9.17(c), Tambre will collect all recalled cannabis items that are returned, have personnel that supervise quality control review it, track it in the inventory control system, and segregate it in quarantine until the Commission authorizes disposal, at which point Tambre will dispose of it in a manner that ensures that it is unusable.

If, for any reason, cannabis items are no longer suitable or permitted for sale, cannabis items will be disposed of, destroyed, or otherwise rendered unusable. As per N.J.A.C. §17:30-9.14(a), prior to destruction or disposal of any cannabis item, Tambre will document through written record the weight and/or quantity of each cannabis item and update the inventory record to reflect the destruction. The cannabis waste will then be disposed of in accordance with local and state regulations.

Waste destruction and disposal will always occur under direct video surveillance. The General Manager or a designated inventory manager will always oversee the destruction or disposal or any cannabis item and will document the manner of destruction and disposal, storage, and removal from the retail facility. Additionally, at least one other authorized employee will always witness the destruction or disposal of any cannabis item.

The manager who has overseen the disposal of the cannabis items will maintain and make available a separate record of every disposal. Each record will indicate the following items:

- Date and time of disposal and destruction;
- Strain or product name to identify the cannabis;

- The unique identification codes associated with the cannabis items scheduled for destruction;
- Quantity or weight of cannabis items to be disposed and destroyed;
- The manner of disposal and destruction;
- The volume and weight of the approved solid waste media used to render the cannabis unusable, if applicable;
- The reason(s) for and description of the disposal; and
- Signatures of the senior manager disposing of the cannabis items, plus at least one witness who is an authorized employee.

As per N.J.A.C. §17:30-9.14(c), within ten (10) days of the destruction or disposal of cannabis items, for any reason, Tambre will notify the Commission in writing, detailing at minimum the form, weight and quantity of cannabis items destroyed. All cannabis destruction/disposal records will be maintained for at least two (2) years, per N.J.A.C. §17:30-9.7(h). This information will also be entered into Metrc, the Commission-approved seed-to-sale tracking system, by the General Manager or designated inventory manager.

Pursuant to N.J.A.C. §17:30-9.14(b,) in the event the license is expired or revoked, Tambre will immediately discontinue sales of cannabis items and prepare for their destruction by weighing or otherwise quantifying all cannabis items to update the inventory system. Within seventy-two (72) hours of license expiration or revocation, Tambre will then either destroy the cannabis items or provide them to the CRC.

Standard operating procedures as outlined in the on-site Operations Manual, will prohibit employees from disposing of cannabis items in the general trash to reduce risk of theft, burglary, or diversion. Cannabis items subject to waste disposal protocols include, without limitation:

- Display samples;
- Cannabis items in incorrectly packaged or labeled or damaged packages or broken seals per N.J.A.C. §17:30-13.2(g);
- Cannabis items labeled with expired dates; and
- Cannabis items subject to recall or otherwise identified as a potential risk.

Cannabis items will be removed and separated from any packaging or containers, and the cannabis items will be rendered unusable prior to disposal at an authorized solid waste facility. Acceptable methods of rendering the waste unusable and unrecognizable include thermal treatment or melting, shredding, grinding, or tearing, and incorporating the cannabis waste with other waste.

## Cannabis Waste Storage and Transportation

All cannabis scheduled for disposal will be stored in a secured waste container in the Secured Storage, prior to being rendered unusable, and will be tracked using the track and trace inventory control system. Access to cannabis items scheduled for disposal will be limited to authorized employees, as designated by the General Manager.

All cannabis waste and recyclable packaging will be managed in accordance with applicable state and local waste statutes, ordinances, and regulations. Once rendered unusable, the cannabis waste may be stored in a locked waste receptable to prevent unauthorized access.

Destroyed cannabis waste will promptly be transported to a permitted waste landfill or processed at a permitted resource recovery facility or incinerator. The transportation of waste will be done separately from cannabis deliveries to avoid contamination. If a third-party company is contracted to remove cannabis waste from the premises, Tambre will provide their contact information to the Commission. Tambre will comply with requests for information regarding the name of the waste

hauler, their address, primary contact name/telephone number, date and time stamped receipts for service, and certified weight tickets.

#### **SANITATION**

## Overview

Tambre will follow PEOSH Sanitation Standards, adopted from the U.S. Department of Labor, Sanitation Standard (OSHA) established in 29 CFR 1910.141 to maintain a clean and safe working environment for employees, as well as for consumers, at the retail facility. All floors, contacts, and work surfaces will be kept free of hazards and cleaned on a regular schedule.

Tambre will maintain the retail facility in a hygienic manner, through regularly scheduled cleaning, including waste disposal. Floors, working surfaces and passageways will be kept free of protruding nails, loose boards, unnecessary openings, or any other condition which impedes cleaning, per 29 CFR 1910.141(a)(3), and fire lanes will always be kept clear and accessible.

Waste receptacles will be placed conveniently and frequently enough to encourage their use, while also ensuring that there will be no overflow of waste from any receptacle. If necessary, Tambre will equip all waste containers with lids to ensure that waste does not escape the container. To avoid creating hazards in the workplace, waste receptacles will be emptied no less than once per business day and kept clean, unless unused for the day.

Containers containing putrescible solids (organic, perishable waste, such as in food consumption areas), liquid waste or refuse will be constructed so that there is no leaking, and so the receptacle may be thoroughly cleaned and sanitized. All sweepings, solid or liquid wastes, refuse and garbage will be removed as often as necessary.

Through adherence to Waste Disposal and Sanitation SOPs, as detailed in the Operations Manual, employees will help in maintaining a vermin-free facility. As required by 29 CFR 1910.141(a)(5), should the presence of vermin be detected, Tambre will institute an extermination program implemented by qualified extermination professionals.

### Sanitation Materials

At a minimum, all work surfaces will be cleaned and sanitized prior to commencing, and after completing any activity involving cannabis, using sanitizing agents registered by the Environmental Protection Agency (EPA).

All sanitation materials will maintain their manufacturer's label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category, as well as precautionary statements. This label will not be removed, nor will these sanitation materials be transferred into another container without this label. Before any employee is authorized to use cleaning and sanitation materials, they will read the product manufacturer's information and safety fact sheets or instructions, kept in a binder near their storage site. These safety data sheets will include information about the uses and risks of the materials and will be easily accessible to all employees with job-related duties including the use of chemicals or sanitizers. Employees will also be provided PPE, such as gloves or face masks, when handling cleaning and sanitation materials, in accordance with OSHA guidance. All cleaning and sanitation materials used, including, but not limited to, natural oils, solvents, and chemicals, will be stored in fire-safe lockable containers or cabinets. Spill-kits will be kept throughout the facility for easy access and quick clean-up of any accidental release of chemicals. Employees will be trained on proper handling of cleaning materials, cleaning procedures, and usage of spill-kits; acknowledgements of such training will be maintained in each employee's personal file.

## Sanitation of Employee Areas

In compliance with OSHA regulations 29 CFR 1910.141(b)(1), Tambre will provide potable drinking water readily available for all employees, either through single-use drinking cups filtered and filled at sinks or water coolers or by the use of water fountains. The water will be placed in easily accessible locations and will be always suitably cool and in supply.

Potable water will also be available for the washing of dishes, cooking, and washing of foods. Tambre will clearly mark any non-potable water supplies and outlets as "not safe for health or personal use," in compliance with 29 CFR 1915.88(c)(2). Tambre will have a separate storage area or lockers for employee purses and belongings. Employees will have access to a designated eating and break area, uninhibited by hazardous materials or obstructions and regularly cleaned so that employees may safely consume food and rejuvenate during their shift. Following OSHA standards, employee food storage and consumption will be away from any toxic or hazardous or toxic materials and will not be in the same room as a toilet.

## Sanitation of Lavatories

Tambre, following OSHA guidelines set forth in 29 CFR 1910.141(c) and 29 CFR 1910.141(d), will provide toilet facilities that combine toilet rooms with lavatory handwashing facilities within the same room. Signage in the lavatories will remind employees to wash their hands before returning to their workstation. Lavatories will be maintained in a sanitary condition and will be immediately available to employees. An adequate number and type of toilet facilities will be provided for the number of employees on the premises. Each lavatory will meet OSHA requirements for providing potable water, either hot and cold running water, or tepid running water. All lavatories will be equipped with bodily cleaning agents such as hand soap and individual hand towels or air blowers for employees to hygienically dry their hands. Tambre will provide alcohol-based hand sanitizers with at least 60% alcohol so that employees and consumers can frequently sanitize their hands, as per OSHA guidelines. Additionally, all toilet facilities will be adequately ventilated and screened. To ensure privacy, all toilet facilities will have self-closing doors that can be locked from the inside.