



July 29, 2021

UltiMed Inc.
350 Highway 7, Suite 100 Excelsior
MN 55331

Sent via e-mail

Re: CalRecycle's Completeness Review of UltiMed, Inc.'s Stewardship Plan

Dear Mr. Erickson:

The Department of Resources Recycling and Recovery (CalRecycle) received UltiMed, Inc.'s (UltiMed's) stewardship plan for home-generated sharps waste on July 2, 2021, titled, "UltiMed Sharps Stewardship Plan." The California Code of Regulations (CCR), Title 14, Section 18973.1(b) requires CalRecycle to determine if the stewardship plan is complete and notify UltiMed of its determination within 30 days of receipt.

Staff reviewed UltiMed's stewardship plan for completeness pursuant to the requirements in the Public Resources Code (PRC) section 42032(c) and CCR section 18973.1(b) and found the stewardship plan is incomplete. This completeness determination is separate from the compliance determination CalRecycle will conduct once it receives a complete plan (see CCR sections 18973.1(d)-(f)). Attachment 1 identifies the additional information required, including the location(s) in the plan, where, based on CalRecycle's understanding, UltiMed attempted to meet the requirements (see 3rd column of table for page and section numbers).

UltiMed must resubmit its stewardship plan to CalRecycle within 30 days of CalRecycle's notification that its stewardship plan is incomplete. If CalRecycle determines, upon resubmittal, that UltiMed's stewardship plan is complete, CalRecycle shall have 90 days from the date of receipt of the resubmitted stewardship plan to review for compliance with all statutory and regulatory requirements and approve, conditionally approve, or disapprove. Should it be necessary for CalRecycle to consult with other state agencies, CalRecycle's review time may be extended (see CCR section 18973.1(c)).

Questions regarding this letter may be directed to pharmasharps@calrecycle.ca.gov.

Signed by Rachel Machi Wagoner, Director

Dated: July 29, 2021

Rachel Machi Wagoner
CalRecycle Director

Cc: Clark Williams, CalRecycle
Cynthia Dunn, CalRecycle

Attachment 1. Additional Information Required in UltiMed Sharps Stewardship Plan

Number	Statute / Regulation Reference	Plan Section / Page Numbers	Comment
1	CCR 18973.3(d)(1), PRC 42032.2(d)(1)(B), 42032(b)	Section 5, Page 14	Include either state agency determinations or compliance certifications pursuant to CCR 18973.3(d)(1), which are missing.
2	CCR 18973.3(d)(2), PRC 42035.8 PRC 42032.2(d)(1)(D)	Section 5, Page 14	Include the written certification required in CCR 18973.2(d)(2), which is missing.
3	CCR 18973.3(e), 18973.6(c) PRC 42032.2(d)(1)(C)	Section 6, Pages 15 and 16	Include reserve level amount and justification pursuant to CCR 18973.6(c), which is missing.
4	CCR 18973.3(f)(6)	Section 7.5, Page 25	Include metrics used to measure the amount of sharps waste containers and mail-back materials distributed. The required information is missing.
5	CCR 18973.3(f)(9)	Section 7.8, Page 26, and Section 7.4.1.4, Page 25	Include corrective actions for critical instances of noncompliance related to home-generated sharps waste handling, transportation and disposal aspects of stewardship plan policies and procedures. The required information is missing.
6	CCR 18973.3(i)(1 & 2), PRC 42032.2(f), 42031.6(a)(1)-(2)	Section 10	Provide specific details on what education and outreach activities will occur, including signage. Part of the required information is missing.

Number	Statute / Regulation Reference	Plan Section / Page Numbers	Comment
7	CCR 18973.3(i)(5) PRC 42032.2(f), 42031.6(a)(1)-(2)	Section 10.5, Page 30	Include specific metrics pursuant to CCR 18973.3(i)(5). The required information is missing.
8	CCR 18973.3(i)(7) PRC 42032.2(f), 42031.6(b)	Section 10.7, Page 30	Include a description of how UltiMed will not promote the disposal of covered products in a manner inconsistent with the services offered to ultimate users by the stewardship program. The required information is missing.
9	CCR 18973(e) PRC 42033	Page 5	Certification statement must be revised to include budget or include separate certification statement for the initial program budget. The required information is missing.
10	CCR 18973.6(a)(1-6) PRC 42033	Section 2, Page 10	Include contact information pursuant to CCR 18973.6(a)(1-6). The required information is missing.
11	CCR 18973.6(b), 18973.6(d), 18973.6(e) PRC 42033	Section 6, Pages 15 and 16	Budget items must include "separate line items" for specific cost categories and descriptions of the types of activities relative to each cost category, as outlined in CCR sections 18973.6(b) and 18973.6(e). Include the recommended funding level necessary to cover the stewardship plan's budgeted costs and to operate the stewardship program over a multi-year period in a prudent and responsible manner, as outlined in CCR section 18973.6(d). The aforementioned required information is missing.
12	CCR 18973.6(f) PRC 42033.2(c)(1), 42033.4(b)(1) PRC 42033	N/A	Include funding in budget for annual independent financial audit. The required information is missing.