



May 2, 2022

Mr. Jim Wilson  
Lead Director, Legal and Compliance  
MED-Project  
1800 M Street, NW  
Suite 400 South  
Washington, DC 20036

Sent via e-mail

**Re: CalRecycle's Completeness Determination of MED-Project's Annual Program Budget for Home-Generated Sharps Waste**

Dear Mr. Wilson:

The Department of Resources Recycling and Recovery (CalRecycle) received MED-Project USA's (MED-Project) annual program budget for home-generated sharps waste, on March 31, 2022, as part of its 2021 annual report titled, *MED-Project 2021 Annual Report for the State of California, Sharps*. The California Code of Regulations (CCR), Title 14, section 18973.1(b) requires CalRecycle to determine if the annual program budget is complete and notify MED-Project of its determination within 30 days of receipt.

Staff reviewed MED-Project's annual program budget for completeness pursuant to the requirements in the Public Resources Code (PRC) section 42033.2(a)(2) and 42033.2(c) and CCR sections 18973.1(b) and 18973.6 and found the annual program budget incomplete. PRC sections 42033.2(a) and (a)(2) require a program operator to submit, by March 31, 2022, a written program budget for the upcoming calendar year. A program budget for calendar year 2023 is required. MED-Project submitted a program budget for calendar year 2022. Therefore, the entirety of the submitted annual program budget is incomplete. However, CalRecycle evaluated the information in the 2022 budget and is providing information, for illustrative purposes only, that MED-Project can consider when preparing its revised annual program budget (see Attachment 1).

This completeness determination is separate from the compliance determination that CalRecycle will conduct once it receives an annual program budget it determines is complete pursuant to CCR sections 18973.1(d) through (f).

MED-Project must resubmit its 2023 annual program budget to CalRecycle within 30 days of CalRecycle's notification that its annual program budget is incomplete. If CalRecycle determines, upon resubmittal, that MED-Project's 2023 annual program budget is complete, CalRecycle shall have 90 days from the date of receipt of the resubmitted annual program budget to review for compliance with all statutory and regulatory requirements and approve, conditionally approve, or disapprove the 2023 annual program budget.

**Re: CalRecycle's Completeness Review of MED-Project's Annual Program Budget for Home-Generated Sharps Waste**

Questions regarding this letter may be directed to [pharmasharps@calrecycle.ca.gov](mailto:pharmasharps@calrecycle.ca.gov).

Regards,

Signed by: Rachel Machi Wagoner

Dated: May 2, 2022

Attachment 1: Staff Observations regarding MED-Project's Annual Program Budget for Sharps, for Illustrative Purposes Only

Cc: Jason Smyth, Supervisor, Pharmaceutical and Sharps Unit  
Becky Haworth, Environmental Scientist, Pharmaceutical and Sharps Unit  
Morgan Buchan, Environmental Scientist, Pharmaceutical and Sharps Unit

**Attachment 1. Staff Observations regarding MED-Project's Annual Program Budget for Sharps, for Illustrative Purposes Only**

<b>Number</b>	<b>Statute / Regulation Reference</b>	<b>Comment</b>
1	CCR section 18973(a)	Ensure the document is in compliance with section 7405 of the Government Code, and the Web Content Accessibility Guidelines 2.0 published in 2008 by the Web Accessibility Initiative of the World Wide Web Consortium at a minimum Level AA success criteria to allow for posting on the department's website pursuant to CCR 18973(a).