



February 15, 2024

Certified Tracking Number  
7022 0410 0001 9245 4128

Jim Erickson, President & CEO  
UltiMed, Inc.  
350 Highway 7, Suite 100  
Excelsior, MN 55331

**Re: CalRecycle's Completeness Determination for UltiMed's Revised 2022 Annual Report for Home-Generated Sharps Waste**

Dear Mr. Erickson:

The Department of Resources Recycling and Recovery (CalRecycle) received UltiMed, Inc's (UltiMed) revised 2022 annual report for home-generated sharps waste on January 19, 2024, titled, *Pharmaceutical and Sharps Waste Stewardship 2022 Annual Report*. Public Resources Code (PRC) section 42033.2(d)(1) and Title 14 of the California Code of Regulations (14 CCR) section 18973.1(b) require CalRecycle to determine if the annual report is complete and notify UltiMed of its determination within 30 days of receipt (i.e., by February 18, 2024).

Staff reviewed UltiMed's revised 2022 annual report for home-generated sharps waste for completeness pursuant to the requirements in PRC sections 42033.2(a) and (b) and 14 CCR sections 18973, 18973.1(b), and 18973.5 and found the annual report complete. The annual report completeness determination is separate from the compliance determination that CalRecycle will now conduct pursuant to 14 CCR sections 18973.1(d) through (f). CalRecycle has 90 days from the date of the annual report submittal to review for compliance with all statutory and regulatory requirements and approve, conditionally approve, or disapprove the annual report (i.e., by April 18, 2024).

UltiMed's revised 2022 annual report submitted to CalRecycle clearly indicates the submission is in response to CalRecycle's Notice to Cure, which pertained only to UltiMed's annual report for home-generated sharps waste. Additionally, UltiMed's email that accompanied the revised annual report referred only to an annual report and not to a resubmitted budget. In conducting the completeness review, CalRecycle found that the revised 2022 annual report included the 2024 annual program budget. Based on the foregoing, CalRecycle believes that the inclusion of the budget was erroneous and that UltiMed did not intend this to be a submission for a 2024 budget review; accordingly, CalRecycle will not be reviewing the 2024 annual program budget that was included in the January 19, 2024, submission. Instead, CalRecycle will continue its review of the 2024 budget based on the previous submittal and the additional supporting documentation provided by UltiMed. If CalRecycle's conclusion regarding the submission of the budget is

incorrect and UltiMed intended to resubmit the 2024 annual budget, contact CalRecycle to provide this clarification.

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

Regards,

**Signed by:** Mindy McIntyre, Chief Deputy Director

**Dated:** February 15, 2024

cc: Eric Yee, Supervisor, Pharmaceutical and Sharps Enforcement Unit