

September 17, 2024

SENT VIA ELECTRONIC MAIL

Cynthia Dunn

Manager, Product Stewardship Section

California Department of Resources Recycling and Recovery

PO Box 4025

Sacramento, CA 95814

pharmasharps@calrecycle.ca.gov

Re: Notification of Changes to the MED-Project Product Stewardship Plan for Home-Generated Sharps Waste

Dear Ms. Dunn,

MED-Project USA (“MED-Project”) is submitting this letter to notify the State of California Department of Resources Recycling and Recovery (“CalRecycle”) of changes to the MED-Project Product Stewardship Plan (the “Plan”) for Home-Generated Sharps Waste dated August 22, 2022, and approved November 15, 2022.

MED-Project has identified changes to the Program that will result in increased operational flexibility, efficiency, and reduced costs. Accordingly, MED-Project proposes to replace sections of the Plan identified in Attachment A of this letter.

MED-Project appreciates CalRecycle’s consideration of the proposed changes. We look forward to continuing to work with CalRecycle to implement MED-Project’s Plan for California residents. Please contact me with any questions about this letter at 1 (833) 633-7765 or california@med-project.org.

Sincerely yours,



Dr. Victoria Travis, PharmD, MS, MBA

National Program Director

MED-Project USA

Certifications

As required by 14 CCR § 18973(e), I hereby declare, under penalty of perjury, that the information provided in this document is true and correct, to the best of my knowledge.

Additionally, as required by 14 CCR § 18973.3(d)(2), I hereby certify that, at the time of submission to the Department, the stewardship plan, including all aspects of the plan related to the handling, transportation, and disposal of Home-Generated Sharps Waste, is in compliance with all applicable local, state, and federal laws and regulations.



Dr. Victoria Travis, PharmD, MS, MBA

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The M Street address is both the mailing and physical address.

Attachment A

Section 6: Handling, Transport, and Disposal

Revise Section 6: Handling, Transport, and Disposal to add the following paragraph.

Sharps Solutions, LLC is the initially designated service provider for HHW Removal Services as defined in Section 7 subject to PRC 42032.2(d)(1)(D), 42035.8, 14 CCR 18973.3(f)(1), 18973.3(f)(3), and 18973.3(f)(4) as applicable, where MED-Project provides for HHW Removal Services as outlined in Section 7: Local Agency Requests. Sharps Solutions' mailing and physical addresses are 23575 Cabot Blvd, Suite 205, Hayward, CA 94545.

The HHW Removal Services service provider will be required to comply with all applicable laws, regulations, and other legal requirements and will transport Home-Generated Sharps Waste to appropriately licensed treatment or disposal facilities. MED-Project will provide the name and address of any subsequent service provider in Annual Reports.

The service provider will use the following treatment facilities:

- Daniels Sharpsmart, Inc.
 - Mailing and physical address: 4144 East Therese Avenue, Fresno, CA 93725
- Trilogy MedWaste West - Vernon
 - Mailing and physical address: 4280 Bandini Boulevard, Vernon, CA 90058

An additional disposal facility will be added as follows:

- Waste Management El Sobrante Landfill
 - Mailing and physical address: 10910 Dawson Canyon Road, Corona, CA 92833

Section 7: Local Agency Requests

Revise Section 7: Local Agency Requests by replacing the section with the following paragraphs.

At MED-Project's option, and upon a Local Agency request, MED-Project will work with a Local Agency to arrange for the removal of Home-Generated Sharps Waste collected from a local household hazardous waste facility ("HHW Removal Services") by a MED-Project service provider, unless MED-Project elects to reimburse the Local Agency for actual costs of Home-Generated Sharps Waste transportation and disposal removal services ("HHW Reimbursement"). A Local Agency that requests services must provide information on the Home-Generated Sharps Waste to MED-Project within a reasonable time upon request to be considered for either HHW Removal Services or HHW

Reimbursement. MED-Project will provide a written response within 14 days of receipt of a written request from a Local Agency and will identify the method to resolve a request by selecting either HHW Removal Services or HHW Reimbursement.

When MED-Project determines that it will provide HHW Removal Services to a Local Agency, MED-Project will work with a Local Agency to establish HHW Removal Services by entering into an agreement establishing each parties' obligations including complying with all applicable laws. MED-Project will arrange for HHW Removal Services under such agreement with the Local Agency to occur as often as required according to CA HSC Section 117904 or by the local enforcement authority. Where an agreement is finalized, MED-Project will designate a service provider to provide Home-Generated Sharps Waste Containers at each local household hazardous waste facility as specified by the agreement, if any. The service provider will transport the collected Home-Generated Sharps Waste to an appropriate licensed treatment or disposal facility. The service provider will be required to comply with all applicable laws regarding the transportation and disposal of Home-Generated Sharps Waste. For purposes of this Section, the service provider means a vendor that is under an agreement with MED-Project to transport and dispose of Home-Generated Sharps Waste collected according to an agreement between a Local Agency and MED-Project.

In the event MED-Project elects to provide HHW Reimbursement to a Local Agency, MED-Project will notify the Local Agency in writing of the decision to reimburse the Local Agency. If MED-Project determines that a HHW Reimbursement will be provided to a Local Agency, the Local Agency must provide an invoice for the costs to be reimbursed and comply with the requirements in PRC 42032.2(d)(1)(F)(ii). After such notification by MED-Project to the Local Agency, the Local Agency must submit an invoice to MED-Project that provides sufficient details that MED-Project is able to determine the costs that are reimbursable for only transportation and disposal costs associated with Home-Generated Sharps Waste removed from the local household hazardous waste facility in accordance with PRC 42032.2(d)(1)(F)(ii). MED-Project will not reimburse any costs that are not specifically allowed under PRC 42032.2(d)(1)(F)(ii). MED-Project will issue payment for allowed costs within 45 days of receipt of a Local Agency's invoice, where MED-Project has agreed to reimburse the Local Agency.

[PRC 42032.2(d)(1)(F)(ii)-42032.2(d)(1)(F)(ii)(IV), 14 CCR 18973.3(g)(1)-18973.3(g)(2)(B), 18973.3(k)]

Section 8: Ongoing Support

Revise the last bullet to remove "Accept Local Agency requests for reimbursement allowed under PRC 42032.2(d)(1)(F)(ii) and 14 CCR 18973.3(g)."

Section 11: Metrics

The following sections provide the metrics MED-Project will use to measure Program performance.

[14 CCR 18973.3(f)(6), 18973.3(f)(8), 18973.3(i)(5)]

Home-Generated Sharps Waste Collected by Household Hazardous Waste Facilities

MED-Project will record and track the following information to maintain metrics from Local Agencies that are provided HHW Removal Services:

- Name and location of the local household hazardous waste facility provided HHW Removal Services.
- Total weight of Home-Generated Sharps Waste disposed through the HHW Removal Services.

MED-Project will record and track the following information to maintain metrics from Local Agencies that are provided HHW Reimbursement:

- Name and location of the local household hazardous waste facility requesting reimbursement.
- Total amount reimbursed by facility.
- Total weight of Home-Generated Sharps Waste reported disposed by the Local Agency.

[14 CCR 18973.3(f)(8)]

Appendix L

Revise Appendix L to update the regulatory map for 14 CCR 18973.3(g)(2)(B) by adding the following.

Regulatory Map

18973.3(g)(2)(B)

- Regulatory Requirement: Removal of Home-Generated Sharps Waste.
- Plan Section(s): [Section 7: Local Agency Requests](#).