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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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[www.lacountyiswmtf.org](http://www.lacountyiswmtf.org)

October 25, 2021

Ms. Rachel Wagoner, Director  
California Department of  
Resources Recycling and Recovery (CalRecycle)  
P.O. Box 4025  
Sacramento, CA 95812-4025

Dear Ms. Wagoner:

**COMMENTS ON THE HOME-GENERATE SHARPS WASTE STEWARDSHIP PLAN  
SUBMITTED BY ULTIMED, INC.**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to comment on the Home-Generated Sharps Waste Stewardship Plan (Stewardship Plan) submitted by UltiMed, Inc. (UltiMed) on October 11, 2021.

The Task Force strongly supports extended producer responsibility programs and welcomes the opportunity to comment on stewardship plans especially those that support local jurisdictions' efforts in managing and properly disposing of sharp and other pharmaceutical wastes. Furthermore, the Task Force commends CalRecycle for developing the regulations earlier this year pursuant to the requirements of Senate Bill 212 Solid waste: pharmaceutical and sharps waste stewardship (2018).

Overall, UltiMed has detailed a comprehensive Mail-Back and education and outreach program consistent with the adopted regulations. Direct users of sharps, medical prescribers of sharps, and pharmacies can straightforwardly comply with UltiMed's thorough Mail-Back process to safely and securely collect, track, and properly manage home-generated sharps waste. In addition, UltiMed has outlined their processes to reimburse local jurisdictions for transportation and disposal costs related to home generated sharps waste collected at local household hazardous waste (HHW) facilities.

However, the Task Force is concerned with a number of UltiMed's proposals as listed below together with the Task Force's recommendations to remedy those concerns:

- Sale of UltiGuard Safe Pack Insulin syringes and pen needles only in quantities of 100 and limiting their collection methods for the management of all used sharps to only Mail-Back. The Task Force strongly encourages CalRecycle to require UltiMed to also provide for smaller shipment sizes in quantities of 25 and 50.
- UltiMed proposes to not provide alternative sharps waste collection methods and solely rely on their Mail-Back program. As such, UltiMed intends to not implement a receptacle-based program at authorized and approved home-generated sharps consolidation points or manage take-back events. The Task Force believes that covered entities and stewardship organizations should propose a backup plan for when direct users of the sharps are unable to or are unwilling to comply with the Mail-Back instructions. In addition to using UltiMed products, direct users may use other home-generated sharp devices that are covered under another covered entity or stewardship organization and may disregard instructions specifically designed for UltiMed's sharp devices. UltiMed should provide the direct user with alternative methods for safely and properly managing their sharps which includes drop off at a consolidation point such as a kiosk at a local pharmacy or hospital.
- The Task Force recommends that as a precaution for emergencies or those cases that the direct user lose the container/mailee, UltiMed should be required to provide the direct users with a link to CDPH's Home-Generated Sharps and Pharmaceutical Consolidation Points website which provides addresses of local Consolidation Points facilities that accept sharp waste. In an emergency situation, this list of local consolidation points would help to direct users locate a reliable alternative for properly ridding of their sharp wastes including properly dropping off UltiMed's UltiGuard Safe Pack containers filled with sharp wastes. UltiMed should also elaborate in their stewardship plan how they plan to encourage direct users of UltiMed's sharp devices to use the Mail-Back program preferably over dropping off the sharp devices at take-back consolidation points.
- UltiMed has stated that they do not intend to collect any metrics to measure the amount of home generated sharps collected by HHW facilities. However, the Task Force can foresee situations where direct users willingly or unknowingly discard their sharps in trash or recycling receptacles. Some of these sharps will be collected by waste haulers and sent to HHW facilities. In addition, direct users may inadvertently include sharps with other hazardous household waste and drop them off at HHW collection events. The Task Force strongly recommends that CalRecycle require UltiMed, at a minimum, describe in their stewardship plan how they plan to collect metrics to measure the amount of Home-generated sharps collected by HHW events/facilities and explain corrective actions that they will take if they discover critical instances of noncompliance with their stewardship plan procedures. Adequate funding for these situations should be noted in their stewardship plan.

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Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (AB 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

In summary, the Task Force strongly encourages CalRecycle to consider the above recommendations as a part of the UltiMed's stewardship plan review and approval process. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@yahoo.com](mailto:MikeMohajer@yahoo.com) or at (909) 592-1147.

Sincerely,



Sam Shammas, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force

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cc: California State Association of Counties  
League of California Cities – Los Angeles County Division  
Each Member of the Los Angeles County Board of Supervisors  
Fesia A. Davenport, Los Angeles County Chief Executive Officer  
Gateway Cities Council of Governments  
San Gabriel Valley Council of Governments  
South Bay Cities Council of Governments  
Westside Cities Council of Governments  
Each City Mayor and City Manager in the County of Los Angeles  
Each City Recycling Coordinator in the County of Los Angeles  
Each Member of the Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force