



Home Generated Sharps Waste Stewardship Plans

Charles Darensbourg

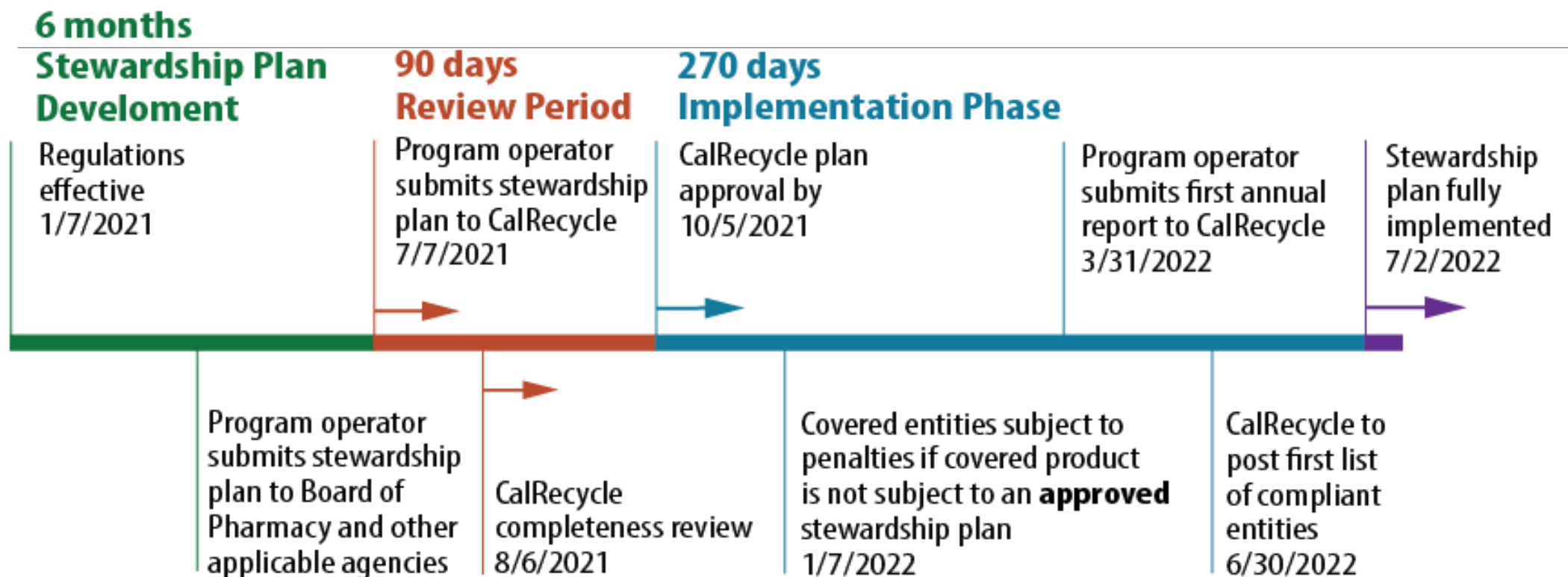
Home-Generated Sharps Waste Threatens Public Health and Safety

SB 212 → Safe and Convenient Sharps Disposal for Consumers

- SB 212 Solid waste: pharmaceutical and sharps waste stewardship (2018) established the Pharmaceutical and Sharps Waste Stewardship Program.
- CalRecycle is the lead state oversight department for this law.
- The California State Board of Pharmacy also has oversight of specific provisions.
- On January 7, 2021, the Office of Administrative Law approved the Pharmaceutical and Sharps Waste Stewardship Regulations.

Stewardship Program Implementation

Timeline*



* The arrows (→) reflect the ability for dates to move depending on the duration of Board of Pharmacy's review prior to the program operator's plan submittal to CalRecycle, potential plan resubmittals, and the time it may require CalRecycle to consult with other state agencies.

Stewardship Plan for Home - Generated Sharps Waste

Plan submitted to CalRecycle must include the following:

- *Contact information of:*
 - *the corporate officer*
 - *Each covered entity participating in the stewardship plan*
- *List of sharps sold/offered for sale by each participating covered entity*
- *State Agency Determinations and written compliance certification*
- *Initial Program Budget*
- *Collection, Transportation, and Disposal System*
- *Local Agency Requests*
- *Ordinance Repeals*
- *Education and Outreach*
- *Coordination Efforts*
- *Process for providing grants, loans, or other incentives.*
- *Process for selecting service providers, including a description of any competitive procedures.*

The Collection, Transportation, and Disposal System

Plans shall describe the processes/policies that will be used to safely and securely collect, track, and properly manage home-generated sharps waste from collection through final disposal.

- Distribution of sharps waste containers and mail-back materials.
- Records generated during the collection, transportation, and disposal.
- Each service provider to be used to transport, process, or dispose of home-generated sharps waste collected.
- Supplemental collection method(s) for home-generated sharps waste



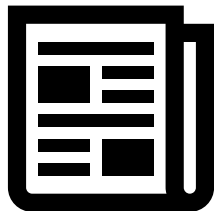
Metrics that will be used to measure:



- The amount of home-generated sharps waste returned.
- Home-generated sharps waste collected through supplemental collection method(s).
- Home-generated sharps waste collected by household hazardous waste facilities operated by local agencies that request reimbursement or removal for disposal of home-generated sharps waste.
- Corrective actions that will be taken if a program operator discovers critical instances of noncompliance with stewardship plan policies and procedures.

Education and Outreach

- Creating/distributing education/outreach materials to promote awareness and maximize ultimate user participation in the stewardship program
- Educate persons authorized to prescribe drugs, pharmacies, pharmacists
- Designing/Providing signage for hospitals, pharmacies, and other locations or labeling for secure collection receptacles
- Establishing an internet website
- Toll-free telephone number to obtain information about the program.



Local Agency Requests

- Establish process for coordinating with local agencies
- Program operators shall:
 - respond to requests by local agencies within 14 days of receipt of the request
 - resolve a request either by providing services or through reimbursement to a local agency by issuing payment within 45 days of receipt of invoice.



*A program operator that provides for the removal of the home-generated sharps waste from the local household hazardous waste facilities shall do so as often as required according to section 117904 of the Health and Safety Code or by the local enforcement authority.

Ordinance Repeals

- The statewide program does not apply to drug or sharps within a jurisdiction that has a local stewardship program ordinance that took effect before April 18, 2018.
- Such a jurisdiction has the option to repeal its ordinance.
- If repealed, the CalRecycle approved statewide program(s) would be required to operate within, and provide services to, that jurisdiction.

Jurisdictions	Pharmaceuticals	Sharps
Alameda County	Yes	Yes
Contra Costa County (unincorporated)	Yes	No
Marin County	Yes	No
San Francisco City/County	Yes	No
San Luis Obispo County	Yes	Yes
San Mateo County	Yes	No
Santa Barbara County	Yes	No
Santa Clara County	Yes	Yes
Santa Cruz County (unincorporated)	Yes	Yes
City of Capitola	Yes	Yes
City of Santa Cruz	Yes	Yes
City of Scotts Valley	Yes	Yes
City of Watsonville	Yes	Yes

Covered entities that have submitted Stewardship Plans for Home - Generated Sharps Waste



UltiMed, Inc.:

- Submitted a home-generated sharps stewardship plan on October 11, 2021.
- CalRecycle requests that comments are submitted to pharmasharps@calrecycle.ca.gov by **October 25, 2021**.

MED-Project: Pharmaceutical Product Stewardship Work Group:

- Represents 73 covered entities that have products that are covered.
- Submitted a covered drugs stewardship plan and a home-generated sharps waste stewardship plan to CalRecycle on September 14, 2021.
- On October 11, 2021, CalRecycle notified MED-Project that its stewardship plans were complete.

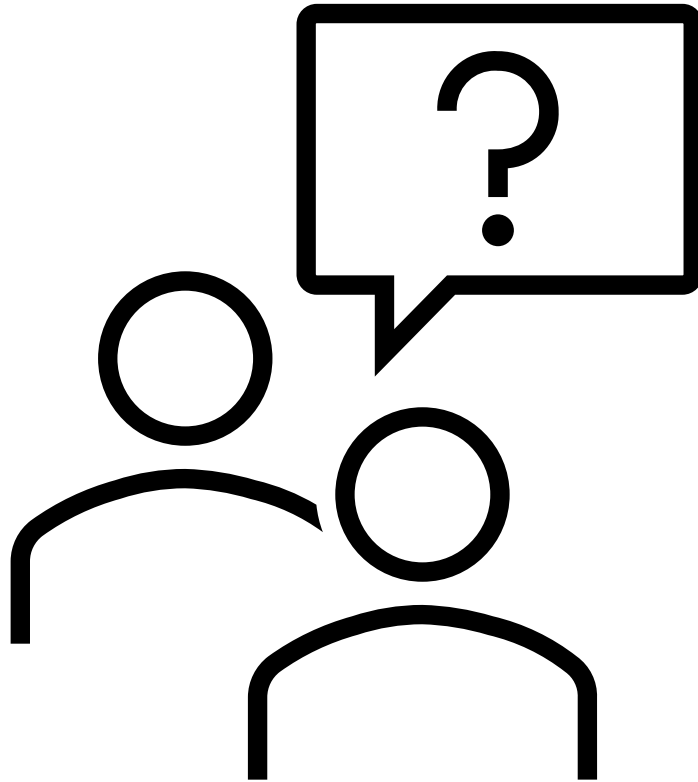


Quick Comparison of UltiMed and Med-Project proposed Alternate Sharps Waste Collection Methods

- Relying solely on their Mail-Back program, **UltiMed** plans not to implement/manage a receptable-based/Take-back program.
- Thus, **UltiMed** does not propose to collect any metrics on these alternatives.
- **Med-Project** also will rely primarily on its Mail-Back program, but they provided a link to CDPH's Home-Generated Sharps and Pharmaceutical Consolidation Points website.
- **Med-Project** will collect metrics to measure the amount of Home generated sharps collected by HHW facilities.



Both **UltiMed** and **Med-Project** outlined their processes to reimburse local jurisdictions for transportation and disposal costs related to home-generated sharps waste collected at local household hazardous waste facilities.



Contact Information:

Charles Darensbourg

Civil Engineer

cdarensbourg@dpw.lacounty.gov

(626) 458-3546

Public comments to pharmasharps@calrecycle.ca.gov on or before October 25, 2021