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STATE OF CALIFORNIA

DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

<b>In the Matter of:</b>	)	<b>ADMINISTRATIVE COMPLAINT</b>
	)	<b>FOR WASTE TIRE STORAGE</b>
<b>JOHN GUZMAN, PROPERTY OWNER</b>	)	<b>ADMINISTRATIVE PENALTIES</b>
<b>AND OPERATOR DBA N &amp; S AUTO</b>	)	
<b>SHOP</b>	)	<b>PUBLIC RESOURCES CODE</b>
	)	<b>SECTION 42800, ET SEQ and</b>
	)	<b>TITLE 14 CCR SECTION 18420 ET</b>
	)	<b>SEQ.</b>
<b>TPID NO: 1496031-01</b>	)	
	)	<b>AGENCY NO: 2019-011213-ADC</b>
	)	
<b>ACCESSOR PARCEL NO: 017-490-05-3</b>	)	
	)	
	)	

**INTRODUCTION**

This Administrative Complaint For Waste Tire Storage Administrative Penalties ("Administrative Complaint") is issued by the California Department of Resources Recycling and Recovery (CALRECYCLE) to John Guzman, Property Owner and Operator dba N & S Auto Shop, (RESPONDENT) seeking \$321,750.00. Pursuant to Public Resources Code (PRC) section 42851(a), CALRECYCLE is authorized to administratively impose penalties on any person to whom civil liability may be levied. This Administrative Complaint is so issued based on the following facts.

1 **STATEMENT OF FACTS**

2 1. CALRECYCLE has the authority to permit, regulate, and conduct enforcement  
3 actions regarding waste tire facilities and waste tire haulers within the State of California  
4 pursuant to PRC sections 42800 et seq., 42950 et seq. and attendant regulations contained in  
5 Title 14 of the California Code of Regulations ("CCR").

6 2. 14 CCR section 42804 defines an operator as "the person responsible for the  
7 overall operation of a waste tire facility."

8 3. 14 CCR section 42805 defines an owner as "a person who owns, in whole or in  
9 part, a waste tire facility, the waste tires located at a facility, or the land on which a waste tire  
10 facility is located."

11 4. 14 CCR section 17225.755 defines an operator as "the person legally  
12 responsible for the operation of a waste tire facility or the owner if there is no operator."

13 5. PRC section 42808 defines a waste tire facility as:

14 . . . a location, other than a solid waste facility permitted pursuant to this division that  
15 receives for transfer or disposal less than 150 tires per day averaged on an annual  
16 basis, where, at any time, waste tires are stored, stockpiled, accumulated, or discarded.  
"Waste tire facility" includes all of the following:

17 (a) "Existing waste tire facility" means a waste tire facility which is receiving, storing, or  
accumulating waste tires, or upon which waste tires are discarded, on January 1, 1990.

18 (b) "Major waste tire facility" means a waste tire facility where, at any time, 5,000 or  
19 more waste tires are or will be stored, stockpiled, accumulated, or discarded.

20 (c) "Minor waste tire facility" means a waste tire facility where, at any time, 500 or more,  
21 but less than 5,000, waste tires are or will be stored, stockpiled, accumulated, or  
discarded. However, a "minor waste tire facility" does not include a tire dealer or an  
22 automobile dismantler, as defined in Sections 220 and 221 of the Vehicle Code, who  
stores waste tires on the dealer's or dismantler's premises for less than 90 days if not  
23 more than 1,500 total used or waste tires are ever accumulated on the dealer's or  
dismantler's premises.

24 6. PRC section 42822 requires CALRECYCLE to "issue major waste tire facility  
permits pursuant to the regulations upon application therefor."

1           7.       Pursuant to PRC section 42823, “no person shall establish a new major waste  
2 tire facility or expand an existing minor waste tire facility unless the person has obtained a  
3 major waste tire facility permit issued by [CALRECYCLE] pursuant to Section 42822.”

4           8.       Pursuant to PRC section 42824, “On and after September 1, 1994, it is unlawful  
5 to direct or transport waste tires to a major waste tire facility or to accept waste tires at a major  
6 waste tire facility unless the operator has obtained a major waste tire facility permit.”

7           9.       14 CCR section 18420(a) requires the operator of a waste tire facility to acquire a  
8 waste tire facility permit, unless the waste tire facility is specifically exempt or excluded from  
9 the permit requirement.

10          10.       Pursuant to 14 CCR section 18423 (a) and (d):

11           (a) Every operator of a new major or minor waste tire facility shall submit to the  
12 Department a complete and correct waste tire facility permit application, as specified in  
Article 4 of this Chapter....

13           (b) For purposes of this Chapter, “Complete and Correct” means all information  
provided by the applicant regarding the waste tire facility is accurate, exact, and fully  
describes all parameters of the waste tire facility.

14          11.       14 CCR section 17351 requires any person storing 500 or more waste tires to meet the  
15 following requirements:

16           (a) The operator of the waste tire facility or solid waste facility shall demonstrate that  
17 they have prepared and submitted a fire safety plan to the fire code official having  
jurisdiction over a particular facility for review and approval. The fire safety plan shall  
18 include provisions for fire department vehicle access. At least one copy of the most  
recent, up-to-date fire safety plan and, if applicable, any approvals shall be made  
19 available at the time of inspection and at the time of application for a new permit, permit  
review or permit revision.

20           (b) Communication equipment shall be maintained at all waste tire facilities and solid  
21 waste facilities, if they are staffed by an attendant, to ensure that the site operator can  
contact local fire authority in the event of fire. The telephone number of the local fire  
22 authority and location of the nearest telephone shall be posted conspicuously in  
attended locations.

23           (c) Adequate equipment to aid in the control of fires shall be provided and maintained at  
24 the waste tire facility or solid waste facility at all times. At a minimum, the following items  
shall be maintained on site and in working order at all times:

- (1) Buildings or structures shall be equipped with portable fire extinguishers in accordance with Section 906 of the California Fire Code;
- (2) One (1) pike pole or comparable pole at least 10 feet in length to separate burning from non-burning tires;
- (3) One (1) round point and one (1) square point shovel; and
- (4) One (1) portable fire extinguisher with a minimum rating of A:40-B:C shall be carried on each piece of fuel-powered equipment used to handle waste tires.

(d) An adequate water supply shall be available for use by the local fire authority. The water supply shall be capable of delivering at least 1,000 gallons per minute for a duration of at least three hours and at least 2,000 gallons per minute for a duration of at least three hours if the sum of altered plus whole waste tires exceeds 10,000. The water supply shall be arranged such that any part of the storage yard can be reached by using not more than 500 feet of hose.

(e) The following precautions against fire shall be maintained at the waste tire facility or solid waste facility at all times:

- (1) No open burning,
- (2) Open flame, cutting, welding, or heating devices, blow torches, or highly flammable materials, including, but not limited to, inner tubes, are prohibited within 40 feet of waste tires.
- (3) No smoking, except in designated areas.
- (4) Tire storage piles shall not be located beneath electrical power lines having a voltage in excess of 750 volts or that supply power to fire emergency systems.

(f) All of the requirements of subsections (a) through (e) above shall apply unless the local fire authority having jurisdiction over a particular facility determines that a different requirement is necessary or adequate to meet the intent of these regulations for fire control and the protection of life and property. This may include the availability of earth moving equipment or other approved means to control the tire fire. Any change in, or any new, local fire authority requirements that affect the requirements in this Article shall be reported to the Department by the operator within 30 days after their effective date. Any requirements approved by the local fire authority shall be subject to Department concurrence at the time of issuance or review of the permit.

12. 14 CCR section 17353(a)(1)–(2) requires:

(a) “All waste tires shall be stored in a manner which prevents the breeding and harborage of mosquitoes, rodents, and other vectors by any of the following means:

- (1) Cover with impermeable barriers other than soil to prevent entry or accumulation of precipitation; or
- (2) Use of treatments or methods to prevent or eliminate vector breeding as necessary, provided the control program is approved as appropriate and effective by the local vector control authority, if such authority exists. If no local vector control authority exists, the local Environmental Health Department or other local agency with authority over vector control shall approve the vector control plan. Any control program approved by the local vector control authority shall be

subject to Department concurrence at the time of issuance or review of the waste tire facility permit.

13. 14 CCR section 17354 states:

(a) Waste tires stored outdoors shall be stored as prescribed in the subsections below, and pursuant to the California Fire Code, Title 24 of the California Code of Regulations, sections 3405.1 through 3405.9, which are hereby incorporated by reference.

(b) All of the requirements in subsections (c) through (j) below shall apply to the storage of waste tires unless, for any particular requirement, the local fire authority having jurisdiction over a particular facility determines that a different requirement is necessary or adequate to meet the intent of these regulations for the prevention of fire and the protection of life and property. Any change in, or any new, local fire authority requirements that affect the requirements in this Article shall be reported to the Department by the operator within 30 days after their effective date. Any alternative requirements approved by the local fire authority shall be subject to Department concurrence at the time of issuance or review of the permit.

(c) Storage of waste tires shall be restricted to individual piles that do not exceed 5,000 square feet of contiguous area. Pile width shall not exceed 50 feet. Any pile shall not exceed 50,000 cubic feet in volume or 10 feet in height.

(d) Tire storage piles containing less than 500 waste tires shall be located no closer than 10 feet from lot lines or buildings; however, tire piles containing less than 500 waste tires may be stored within 10 feet of lot lines or buildings after the operator has obtained approval from the fire code official. Waste tire piles containing less than 500 waste tires shall not exceed 6 feet in height when within 20 feet of any property line, building, or perimeter fencing. Side slopes shall not exceed 60 degrees.

(e) Tire storage piles containing 500 or more waste tires shall be located at least 50 feet from lot lines and buildings, unless the facility is a waste tire facility described in subsections (1) through (4) below.

(1) Where the waste tire facility has obtained approval from the fire code official and the waste tires are stored at an exempt or excluded site defined in 14 CCR section 17225.822, tire storage piles may be located within 50 feet but no closer than 10 feet from lot lines or from buildings.

(2) Where the waste tire facility has obtained approval from the fire code official and the waste tires are stored at a permitted minor waste tire facility, tire storage piles may be located closer than 50 feet but no closer than 10 feet from lot lines and 50 feet from buildings.

(3) Where waste tires are stored at a minor waste tire facility that was issued a minor waste tire facility permit prior to January 1, 2011, tire storage piles may be located closer than 50 feet but no closer than 10 feet from lot lines and 50 feet from buildings.

(4) In no case shall the waste tire storage piles exceed 6 feet in height when within 20 feet of any lot line or perimeter fencing, and side slopes shall not

1 exceed 60 degrees.

2 (f) Any individual waste tire pile shall be separated from any other waste tire pile,  
3 combustible ground vegetation, stored used tires, waste tire material, or products made  
4 from tires, by a distance of at least 40 feet.

5 (g) Waste tire piles shall not be located under bridges, elevated trestles, elevated  
6 roadways, or stored in an area where they may be subjected to immersion in water  
7 during a 100-year storm unless the owner or operator demonstrates that the waste tire  
8 facility or solid waste facility will be designed and operated so as to prevent waste tires  
9 from migrating off-site.

10 (h) At a waste tire facility or solid waste facility storing more than 150,000 cubic feet of  
11 waste tires, adjacent individual waste tire piles shall be considered a group, and the  
12 aggregate volume of storage piles in a group shall not exceed 150,000 cubic feet. Each  
13 group shall be separated from any other group by a distance of at least 75 feet.

14 (i) Tires must be removed from rims immediately upon arrival at the waste tire facility or  
15 solid waste facility. Tires temporarily attached to rims awaiting removal shall be stored  
16 separate from other waste tires.

17 (j) The waste tire facility or solid waste facility shall be designed and constructed to  
18 provide protection to bodies of water from runoff of pyrolytic oil resulting from a potential  
19 tire fire.

20 14. 14 CCR section 17356 requires:

21 (a) Waste tires stored indoors shall be stored in the manner prescribed in the  
22 subsections below, and pursuant to the California Fire Code, Title 24 of the California  
23 Code of Regulations, sections 3201.1 through 3210.1, 3403.1 through 3403.4 and  
24 3409.1, which are hereby incorporated by reference:

(1) Waste tires stored adjacent to or along one wall shall not extend more than  
25 feet from such wall.

(2) Waste tire piles shall not exceed 50 feet in width in any one direction. Where  
waste tires are stored on-tread, standing side by side in rows, the dimension of  
the pile in the direction of the wheel hole shall not be more than 50 feet.

(3) Waste tires shall not be stored in exits or enclosures for stairways or ramps,  
or in boiler rooms, mechanical rooms, or electrical equipment rooms.

(4) Waste tires shall not be stored within 2 feet or less from the ceiling in  
nonsprinklered areas of a building.

(5) Waste tires shall not be stored within 18 inches or less below sprinkler head  
deflectors in sprinklered areas of a building.

(6) Where the top of the storage of waste tires is greater than six feet in height  
waste tires shall be stored in accordance with the following:

(A) Waste tire facilities and solid waste facilities with an indoor storage  
area between 500 square feet and 2,500 square feet shall maintain aisles  
with access to exits and fire access doors in accordance with the following  
requirements:

1 (1) In sprinklered buildings aisles shall be a minimum of 44 inches  
wide.

2 (2) In nonsprinklered buildings aisles shall be a minimum of 96  
inches wide.

3 (3) The required aisle width shall extend from floor to ceiling.

4 (B) Waste tire facilities and solid waste facilities with an indoor storage area exceeding  
2,500 square feet shall maintain aisles with access to exits and fire access doors in  
accordance with the following requirements:

5 (1) In nonsprinklered buildings aisles shall be a minimum of 96 inches wide.

6 (2) In sprinklered buildings where the waste tire piles are accessible to the public  
aisles shall be a minimum of 96 inches wide.

7 (3) In sprinklered buildings where the waste tire piles are not accessible to the  
public aisles shall be a minimum of 44 inches wide.

(4) The required aisle width shall extend from floor to ceiling.

8 (C) For waste tire facilities or solid waste facilities with a storage area of 500 square feet  
or less, the dimensions of the waste tire piles shall not exceed 50 feet in any direction.

9 (D) For waste tire facilities or solid waste facilities with a storage area greater than 500  
square feet the dimensions of the waste tire piles shall not exceed 50 feet in any  
10 direction, 30 feet in height, and 75,000 cubic feet in volume.

11 (E) No waste tire facility or solid waste facility shall store waste tires in an area greater  
than 500,000 square feet.

12 (F) Waste tire facilities and solid waste facilities with an indoor storage area greater than  
500 square feet shall be equipped with an automatic fire extinguishing system that has  
been described by the operator in the fire safety plan required by section 17351(a).

13 (G) Waste tire facilities and solid waste facilities with an indoor storage area greater  
than 2,500 square feet shall be equipped with smoke and heat vents that have been  
14 described by the operator in the fire safety plan required by section 17351(a).

15 (b) For purposes of determining the square footage of storage space described in  
subsection (a) above, the aggregate of all waste tire storage areas within a  
building which are designated, intended, proposed or actually used for storing  
16 waste tires at a maximum height of more than six feet shall be used, unless such  
areas are separated from each other by 1-hour fire barriers that have been  
17 approved by the local fire code official. Openings in 1-hour fire barriers shall be  
protected by opening protectives having a 1-hour fire protection rating.

18 (c) The requirements in subsections (a) and (b) above shall apply unless the  
local fire authority having jurisdiction over a particular facility determines that a  
19 different requirement is necessary or adequate to meet the intent of these  
regulations for fire control and the protection of life and property. Any change in,  
20 or any new, local fire authority requirements that affect the requirements in this  
Article shall be reported to the Department by the operator within 30 days after  
21 their effective date. Any requirements approved by the local fire authority shall be  
subject to Department concurrence at the time of issuance or review of the  
22 permit.

1           15. Pursuant to PRC section 42845(a), CALRECYCLE is authorized to order waste  
2 tire facility operators who are in violation of the laws to clean up waste tire piles, abate the  
3 effects thereof, or otherwise remedy a case of threatened pollution or nuisance.

4           16. Pursuant to PRC section 42850(a) "Any person who negligently violates any  
5 provision of this chapter, or any permit, rule, regulation, standard, or requirement issued or  
6 adopted pursuant to this chapter, is liable for a civil penalty of not less than five hundred  
7 dollars (\$500) or more than five thousand dollars (\$5,000), for each violation of a separate  
8 provision or, for continuing violations, for each day that the violation continues."

9           17. At no time has RESPONDENT been in possession of a major waste tire facility  
10 permit issued from CALRECYCLE.

11          18. RESPONDENT's unpermitted waste tire facility is located at 1619 E Truxtun Ave,  
12 Bakersfield, CA 93305-5431, Assessor Parcel No.017-490-05-3 (the site).

13          19. RESPONDENT's site meets the definition of a major waste tire facility as defined  
14 by PRC section 42808(b).

15          20. During a routine inspection of the site on August 20, 2018, and documented in  
16 Inspection Report number IW-1077489, Bakersfield Inspectors observed that RESPONDENT  
17 was storing 573 waste tires on the site in violation of PRC section 42834 (failure to obtain a  
18 minor waste facility permit issued by CALRECYCLE), and 14 CCR section 18420(a).  
19 Additional violations found during this inspection were 14 CCR section 17351 (fire prevention  
20 measures), 14 CCR section 17352 (site security), 14 CCR section 17353 (vector control  
21 measures), and 14 CCR section 17354 (outdoor storage violations). RESPONDENT was  
22 issued a Notice of Continuing Violation and the case was referred to CALRECYCLE.

23          21. During an inspection of the site on September 25, 2018, and documented in  
24 Inspection Report number IW-1079075, CALRECYCLE, Bakersfield Inspectors, and



1 Bakersfield Police observed that waste tire violations continued on the site. Waste tires were  
2 stored inside and outside in five areas, for a total count of 6,000 waste tires stored on the site.  
3 RESPONDENT had not obtained a major waste tire facility permit that was issued by  
4 CALRECYCLE in violation of PRC section 42824. Additional violations included 14 CCR  
5 section 17353 (vector control), 14 CCR section 17351 (fire safety plan), 14 CCR section 17354  
6 (storage of waste tires outdoors), and 14 CCR section 17356 (waste tires stored indoors).  
7 RESPONDENT was notified of the violations and informed that due to the continued violations  
8 RESPONDENT would be issued a Cleanup and Abatement Order ("CAO") with a compliance  
9 deadline date and if RESPONDENT failed to comply with the compliance deadline date it may  
10 result in further enforcement action.

11 22. On November 15, 2018, CALRECYCLE issued CAO No. 2018-011078-CAO to  
12 RESPONDENT for waste tire storage violations. Effective service of the CAO occurred on  
13 November 23, 2018. The CAO ordered RESPONDENT to reduce and maintain the number of  
14 waste and used tire on site to zero within 30 days from the date of service of the CAO.  
15 RESPONDENT was instructed to not accept additional waste and used tires at the site for the  
16 next 60 days and maintain 499 or less waste tires onsite at all times after the 60 days, unless  
17 RESPONDENT obtained a waste tire facility permit from CALRECYCLE. The CAO directed  
18 RESPONDENT to use a CALRECYCLE registered waste and used tire hauler to transport all  
19 waste and used tires to a CALRECYCLE approved destination, complete a Comprehensive  
20 Trip Log (CTL) documenting each load of waste and used tires removed, and submit the CTLs  
21 to CALRECYCLE within 45 days from the date of service of the CAO. Additionally,  
22 RESPONDENT was ordered to reimburse CALRECYCLE for the costs of all inspections  
23 conducted within a year from the issuance of the CAO that are in addition to those inspections  
24 required by statute or regulation.

23. During a compliance inspection of the site on March 19, 2019, as documented in Inspection Report number IW 1086369, CALRECYCLE inspectors observed that RESPONDENT removed 1,000 waste tires from the site bringing the waste tire count down to 5,000, still in violation of the CAO. RESPONDENT was notified that CALRECYCLE would take further enforcement action for failure to comply with the CAO.

24. 117 days passed between the date of service of the CAO on November 23, 2018, and the reinspection date on March 19, 2019.

### **ALLEGATIONS OF SPECIFIC VIOLATIONS**

25. On at least 117 separate days, RESPONDENT violated PRC section 42824, by unlawfully storing waste tires without possessing a major waste tire facility permit from CALRECYCLE.

26. On at least 117 separate days, RESPONDENT violated 14 CCR section 17351, by failing to have a fire safety plan or alternative plan approved by the fire code official.

27. On at least 117 separate days, RESPONDENT violated 14 CCR section 17353, by failing to store waste tires in a manner that prevents the breeding and harborage of mosquitoes, rodents, and other vectors, and not having controls (covers) to preclude breeding of mosquitoes.

28. On at least 117 separate days, RESPONDENT violated 14 CCR section 17354, by improperly storing waste tires outdoors and not pursuant to the California Fire Code.

29. On at least 117 separate days, RESPONDENT violated 14 CCR section 17356, by improperly storing waste tires indoors and not pursuant to the California Fire Code.

### **PENALTIES**

30. RESPONDENT is liable for administrative penalties as set forth in PRC section 42850 for negligent violations.

1           31. CALRECYCLE's authority to assess administrative penalties against  
2 RESPONDENT for storage violations is set forth in PRC section 42850, which states:

3                   (a) Any person who negligently violates any provision of this chapter, or any  
4                   permit, rule, regulation, standard, or requirement issued or adopted pursuant  
5                   to this chapter, is liable for a civil penalty of not less than five hundred dollars  
6                   (\$500) or more than five thousand dollars (\$5,000), for each violation of a  
7                   separate provision or, for continuing violations, for each day that the violation  
8                   continues.

9                   (b) Liability under this section may be imposed in a civil action or liability may  
10                  be imposed administratively pursuant to this article.

11           32. 14 CCR section 18429(b) authorizes first offense penalties of up to \$1,000 per  
12 day for each day the negligent storage violation continues, where the amount of waste tires is  
13 between 5,000 and 9,999 waste tires.

14           33. In calculating penalties for violations of PRC sections 42823 and 42824,  
15 CALRECYCLE determined that the appropriate risk factor as set forth in 14 CCR section  
16 18429 was .75. Pursuant to 14 CCR section 18429, CALRECYCLE multiplied \$1,000 by the  
17 risk factor (.75) and by the number of days of ongoing violation (117) for a penalty of \$87,750.

18           34. 14 CCR section 18429 authorizes penalties of not less than \$500 or more than  
19 \$5,000, for each separate violation of 14 CCR sections 17351, 17353, 17354, and 17356, for  
20 each day that the violation continues.

21           35. In calculating penalties for a violation of 14 CCR section 17351, CALRECYCLE  
22 multiplied \$500 by the number of days (117) for a penalty of \$58,500.

23           36. In calculating penalties for a violation of 14 CCR section 17353, CALRECYCLE  
24 multiplied \$500 by the number of days (117) for a penalty of \$58,500.

          37. In calculating penalties for a violation of 14 CCR section 17354, CALRECYCLE  
multiplied \$500 by the number of days (117) for a penalty of \$58,500.

1 38. In calculating penalties for a violation of 14 CCR section 17356, CALRECYCLE  
2 multiplied \$500 by the number of days (117) for a penalty of \$58,500.

3 39. CALRECYCLE added the penalties for the violations of PRC sections 42823 and  
4 42824, and 14 CCR sections 17351, 17353, 17354, and 17356 for a total penalty of \$321,750.

5 40. Pursuant to PRC section 42852, in making its decision on this matter,  
6 CALRECYCLE's director shall take into consideration "the nature, circumstances, extent, and  
7 gravity of the violation, the violator's past and present efforts to prevent, abate, or clean up  
8 conditions posing a threat to the public health or safety or the environment, the violator's ability  
9 to pay the proposed civil penalty, and the prophylactic effect that imposition of the proposed  
10 penalty will have on both the violator and on the regulated community as a whole."

11 41. Based on the foregoing paragraphs, CALRECYCLE hereby requests waste tire  
12 storage penalties be assessed against RESPONDENT in the sum of \$321,750.00.


### 13 **RIGHT TO A HEARING**

14 You are hereby notified that pursuant to the provisions of PRC sections 42851 and  
15 42961.1 that you are entitled to a hearing to refute the allegations against you contained in this  
16 ADMINISTRATIVE COMPLAINT FOR WASTE TIRE STORAGE ADMINISTRATIVE  
17 PENALTIES. **If you wish to have a hearing on this matter, you must complete and return**  
18 **the enclosed REQUEST FOR HEARING/ NOTICE OF DEFENSE to our Legal Office within**  
19 **15 days of receipt of this Administrative Complaint. Failure to complete and return the**  
20 **REQUEST FOR HEARING/NOTICE OF DEFENSE within 15 days will be deemed a waiver**  
21 **of your right to a hearing.**

22 Pursuant to the above referenced Public Resources Code and Government Code  
23 sections, discovery requests by any party must be made within 30 days after the service of this  
24

1 ADMINISTRATIVE COMPLAINT FOR WASTE TIRE STORAGE ADMINISTRATIVE  
2 PENALTIES.  
3

4 Dated this 22 day of January, 2020.

  
CATHERINE V. NYSTROM  
Attorney for Department of Resources  
Recycling and Recovery  
(CALRECYCLE)