

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

November 16, 2015

Sent via e-mail

Marjaneh Zarreparvar
Executive Director, PaintCare
1500 Rhode Island Avenue, NW
Washington, DC 20005

Re: PaintCare 2015 California Paint Stewardship Program Year 3 Annual Report

Dear Marjaneh,

The Department of Resources Recycling and Recovery (CalRecycle) received PaintCare's 2015 California Paint Stewardship Program Year 3 Annual Report ("report") on November 3, 2015. California Code of Regulations (Title 14, Division 7, Chapter 11, Article 2, §18952(c)(2)) requires CalRecycle to determine if the report is complete and notify PaintCare within 30 days.

Staff reviewed the report for completeness within the context of the requirements in statute (Chapter 420, Statutes of 2010, Huffman, AB 1343) and the California Code of Regulations (CCR), and found PaintCare's Annual Report to be **complete**.

CalRecycle acknowledges that the required GIS analysis of PaintCare's progress toward reaching its density goal (i.e., the density criterion analysis) for drop-off sites was not performed for this report due to concerns with the accuracy of the GIS analysis model. PaintCare discussed this problem with CalRecycle prior to submitting the report. As soon as the validity of the current GIS model has been determined, and corrected if needed, PaintCare has agreed to submit an updated report with the density criterion analysis.

In addition to the completeness review, CalRecycle has 90 days (by February 1, 2016) in which to review the report and overall program for compliance with Public Resources Code (PRC) Sections 48700-48706 and CCR Title 14, Division 7, Chapter 11, Article 2, Sections 18950-18957 and adopt a finding of compliance, non-compliance, or conditional approval. Staff will present an analysis and recommendation regarding compliance at CalRecycle's Public Meeting on January 19, 2016.

The following topics will be of particular focus during CalRecycle's year 3 compliance review:

- Program convenience
- Baseline and recovery rate
- Paint reuse
- Program costs, including cost per gallon
- Investment of program funds
- Accumulated surplus
- Education and outreach





DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. Box 4025, SACRAMENTO, CALIFORNIA 95812

CalRecycle has requested stakeholder input by December 18, 2015, so that it can be considered during staff's year 3 compliance review.

If you have any questions, please contact Allyson Williams by email at Allyson.Williams@CalRecycle.ca.gov or by phone at (916) 341-6219.

Sincerely,

A handwritten signature in blue ink that reads "Howard Levenson".

Howard Levenson, Ph.D.

Deputy Director, Materials Management and Local Assistance Division

Cc: Scott Smithline, CalRecycle
Allyson Williams, CalRecycle
Elizabeth Wagner, CalRecycle
Ty Moore, CalRecycle
Brenda Smyth, CalRecycle
Jeremy Jones, PaintCare
Paul Fresina, PaintCare

