



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

November 22, 2016

Sent via e-mail

Jeremy Jones
West Coast Program Manager, PaintCare
1500 Rhode Island Avenue, NW
Washington, DC 20005

Re: CalRecycle Determination of Completeness and Compliance of PaintCare's 2016 California Paint Stewardship Program Annual Report

Dear Jeremy,

The Department of Resources Recycling and Recovery (CalRecycle) received PaintCare's 2016 California Paint Stewardship Program Annual Report ("report") on November 2, 2016. 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 has reviewed the report for completeness within the context of the requirements in statute (Public Resources Code §48700-48706) and the California Code of Regulations (CCR), and found PaintCare's Annual Report to be complete.

CalRecycle acknowledges that PaintCare did not provide a GIS analysis regarding progress toward reaching its density goal for drop-off sites in this report, but committed to providing additional information in a revised report by December 1, 2016. CalRecycle intends to review all additional information submitted as part of its compliance review.

With respect to its compliance review, CalRecycle has 90 days (until January 31, 2017) in which to review the report and overall program for compliance with Public Resources Code §48700-48706 and CCR Title 13, Division 7, Chapter 11, Article 2, §18950-18957 and adopt a finding of compliance, non-compliance, or conditional approval. Staff will present an analysis and recommendation regarding program compliance at CalRecycle's January Public Meeting for the Director's consideration.

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

- Program convenience
- Paint disposition
- Program costs/ surplus
- Investment of program funds
- Transition to Limited Liability Corporation



- Product registration/ assessment collection
- Education and outreach

CalRecycle has requested stakeholder input by December 19, 2016, so that comments can be considered in staff's compliance review.

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

Sincerely,



Howard Levenson, Ph.D.
Deputy Director, Materials Management and Local Assistance Division

Cc: Scott Smithline, CalRecycle
Allyson Williams, CalRecycle
Cynthia Dunn, CalRecycle
Brenda Smyth, CalRecycle
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