



June 13, 2025

Brian Phillips
Executive Director
Circular CRV Association
1005 12th Street Lower 1
Sacramento, CA 95814

Sent via e-mail

Re: Second Additional Information Necessary Regarding Circular CRV Association's Stewardship Plan

Dear Brian Phillips,

The Department of Resources Recycling and Recovery (CalRecycle) reviewed Circular CRV Association's letter titled *Responses to Request for Additional Information Necessary Regarding Circular CRV Association's Stewardship Plan*, including an updated stewardship plan, both received on June 6, 2025. CalRecycle determined that additional information is necessary to corroborate or clarify the information provided in the updated stewardship plan. Circular CRV Association has 10 days (until June 23, 2025) to provide additional information to CalRecycle to address the requirements identified in the attached document pursuant to Title 14 of the California Code of Regulations (14 CCR) section 2376(a).

If you have any questions or would like to discuss the contents of this letter, please reach out to CalRecycle at DealerCoops@CalRecycle.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Karen Kayfetz".

Karen Kayfetz
Branch Chief, Product Stewardship Branch
CalRecycle

Cc: Gregory Song, Circular CRV Association

Enclosed: Summary of Additional Information Necessary Regarding Circular CRV Association's Updated Dealer Cooperative Stewardship Plan

**Summary of Additional Information Necessary Regarding Circular CRV Association's
Updated Dealer Cooperative Stewardship Plan**

Requirement	Additional Information Necessary
14 CCR section 2375.2(d): Verification of current exemption from taxation under section 501(c)(3) of the federal Internal Revenue Code of 1986.	Provide the Internal Revenue Service's determination letter verifying Circular CRV Association's current tax-exempt status.
14 CCR section 2375.6(a): The geographic spread of redemption sites and an explanation for the geographic spread. This shall include the number of redemption sites in each unserved convenience zone in which any of the dealer members operate per person.	Clarify how the geographic spread performance standard would be calculated. Confirm that Circular CRV Association would provide one or more redemption locations in each unserved zone in which its dealer members operate pursuant to Public Resources Code sections 14578(a)(2) and 14578.5(c)(3)(A), and subject to the requirements in 14 CCR sections 2370(a), 2375.4(f)(4), and 2375.4(f)(6).
14 CCR section 2375.6(b): The beverage container redemption capacity per quarter for each unserved convenience zone in which any of the dealer members operate. The overall beverage container volume capacity of the dealer cooperative shall, at a minimum, be sufficient to redeem an amount of beverage containers equal to 100 percent of the beverage containers sold by dealer members into unserved convenience zones in which any of the dealer members operate pursuant to section 2375.4(f)(2). The redemption capacity specified in the stewardship plan may incorporate redemption limits established pursuant to section 2375.4(f)(6).	Given the changes presented in the <i>Responses to Request for Additional Information Necessary Regarding Circular CRV Association's Stewardship Plan</i> received on June 6, 2025, clarify or correct the capacity performance standard based on the total amount of beverage containers sold by the dealer members. Clarify whether the estimated annual capacity of beverage containers is 1.51 billion containers or is the adjusted 1.42 billion containers as stated in the "Redemption Capacity Assessment" section of the updated stewardship plan.