



***CRV, Reinvented.***

Circular CRV Association  
1005 12<sup>th</sup> Street, Lower 1  
Sacramento, CA 95814

June 17, 2025

**Karen Kayfetz**  
**Branch Chief, Product Stewardship Branch**  
**CalRecycle**  
**1001 I Street**  
**Sacramento, CA 95814**

**Subject: Responses to Second Request for Additional Information Necessary Regarding Circular CRV Association's Stewardship Plan**

Dear Karen Kayfetz,

Thank you for the opportunity to provide the Department with additional information concerning Circular CRV Association's Dealer Cooperative Stewardship Plan. Enclosed you will find responses to each of the areas for which the Department is seeking additional information, as well as any Attachments that accompany those responses.

Additionally, a revised "Dealer Cooperative Stewardship Plan" dated "June 2025 V2" that includes all changes discussed in the attached responses was emailed at the time this letter was sent to the CalRecycle Dealer Cooperative Group email address.

Please feel free to reach out to me at any time to discuss the contents of this document, and I look forward to working through the approval process with you and your team.

Thank you in advance for your continued support and consideration.

Sincerely

*Brian Phillips*

Brian Phillips  
Executive Director  
Circular CRV Association

cc: Allyson Williams, CalRecycle  
Michelle Martin, CalRecycle  
Dealer Cooperative Team, CalRecycle

**Response to Second Request for Additional Information Regarding Circular CRV  
Association's Dealer Cooperative Stewardship Plan**

**Requirement**

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.

**Additional Information Necessary**

Provide the Internal Revenue Service's determination letter verifying Circular CRV Association's current tax-exempt status.

*Circular CRV Association received a notice of exemption from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). The Determination Letter is dated April 14, 2025, and the effective date of exemption is May 31, 2024. The determination letter is included in this letter as "Attachment C" and will be appended to the Dealer Cooperative Stewardship Plan.*

## **Response to Second Request for Additional Information Regarding Circular CRV Association's Dealer Cooperative Stewardship Plan**

### **Requirement**

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.

### **Additional Information Necessary**

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).

*The second paragraph and related bullet points of Section 17 of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended as follows:*

*To meet the requirements of 14 CCR § 2375.6(a), the benchmark criteria for geographic coverage is as follows:*

- Whenever possible, **the Dealer Cooperative will place one or more redemption methods in the parking lot where each Dealer Cooperative Member operates to maximize consumer convenience 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).***
- In the event at least one redemption method cannot be placed in the parking lot of a Dealer Member, the Dealer Cooperative will identify an alternative location within a one-mile (1.0) radius of the Dealer Member's place of business where at least one redemption method can operate, with the goal of providing convenient access to CRV redemption for a minimum of 80% of the population of the Census tract in which the Dealer Member operates.*
- If a suitable location for at least one convenient redemption method cannot be identified within a one-mile (1.0) radius of the Dealer Member, the Dealer Cooperative will identify at least one location within a one-and-a-half-mile (1.5) radius of the Dealer Member's business, with the goal of providing CRV redemption opportunities to a minimum of 80% of the population of the Census tract in which the Dealer Member operates. However, the Dealer Cooperative does not anticipate frequent use of the one-and-a-half-mile (1.5) radius alternative, as most redemption methods will be placed within the 1.0-mile standard.*

**Response to Second Request for Additional Information Regarding Circular CRV  
Association's Dealer Cooperative Stewardship Plan**

- ***The Dealer Cooperative anticipates instances where placement of a redemption method either in the parking lot or within a one-mile radius of one Dealer Cooperative Member ("hosting Member") will satisfy the requirements of 14 CCR section 2375.4(f)(3) and (4) for another Dealer Cooperative Member operating within the convenience zone of the first Dealer Cooperative Member ("non-hosting Member").***

*Additionally, the sixth and seventh paragraphs of Circular CRV Association's Dealer Cooperative Stewardship Plan will be amended to read as follows:*

***The Dealer Cooperative will calculate the geographic spread performance standard by establishing that each Dealer Cooperative Member either:***

- ***Has one or more redemption methods placed in its parking lot, or one or more redemption methods placed no further than within a one-mile to one-and-a-half radius of its place of business; or,***
- ***Is located within a one-mile radius of another Dealer Cooperative Member that has one or more redemption methods placed in the other Dealer Cooperative Member's parking lot, or placed within a one-mile to one-and-a-half-mile radius of the other Dealer Member's place of business.***

*For each unserved convenience zone in which the Dealer Cooperative will operate, Circular CRV Association will submit a quarterly report that includes the following:*

- *A list of all Dealer Cooperative Members hosting redemption sites; and for each:*
  - *The type of redemption method(s) used at each redemption site;*
  - *The number of redemption method(s) at each redemption site; and*
  - *The number of redemption sites in the unserved convenience zone where the Dealer Member operates.*
- *A list of all Dealer Cooperative Members not hosting redemption sites; and for each:*
  - *The number of redemption sites in the unserved convenience zone where the Dealer member operates; and*
  - *The distance from the non-hosting Dealer Member to the nearest redemption site within the unserved convenience zone where the non-hosting Dealer Member operates.*

## Response to Second Request for Additional Information Regarding Circular CRV Association's Dealer Cooperative Stewardship Plan

### Requirement

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).

### Additional Information Necessary

Given the changes presented in the *Responses to Request for Additional Information Necessary Regarding Circular CRV Association's Stewardship Plan* 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.

*The initial version of the Dealer Cooperative Stewardship Plan dated April 2025 included a capacity performance standard of 1.51 billion containers sold by a total of 243 dealer member stores. Corrections were made to the number of dealer members in the June 2025 version of the Dealer Cooperative Stewardship Plan: **there are now 234 dealer members that collectively sold 1.42 billion containers** (a reduction of nine (9) members and a reduction of 90 million containers). This reduction is not significant enough to reduce the estimated number of units to be deployed in Table 16.8 – Aggregate Redemption Capacity by Method. Therefore, the number of estimated redemption units remains the same; however, **the projected redemption capacity increased from a range of 50.49% - 109.36% to 53.55% - 115.99%.***

# ATTACHMENT C



Department of the Treasury  
Internal Revenue Service  
**Tax Exempt and Government Entities**  
P.O. Box 2508  
Cincinnati, OH 45201

CIRCULAR CRV ASSOCIATION  
1020 N LAKE STREET  
BURBANK, CA 91502-1624

**Date:**  
04/14/2025  
**Employer ID number:**  
99-3606002  
**Person to contact:**  
Name: Edwina O. McCurdy  
ID number: 0203280  
Telephone: 877-829-5500  
**Accounting period ending:**  
December 31  
**Public charity status:**  
170(b)(1)(A)(vi)  
**Form 990 / 990-EZ / 990-N required:**  
Yes  
**Effective date of exemption:**  
May 31, 2024  
**Contribution deductibility:**  
Yes  
**Addendum applies:**  
No  
**DLN:**  
26053689004264

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to [www.irs.gov/charities](http://www.irs.gov/charities). Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Sincerely,

A handwritten signature in cursive script that reads "Stephen A. Martin".

Stephen A. Martin  
Director, Exempt Organizations  
Rulings and Agreements