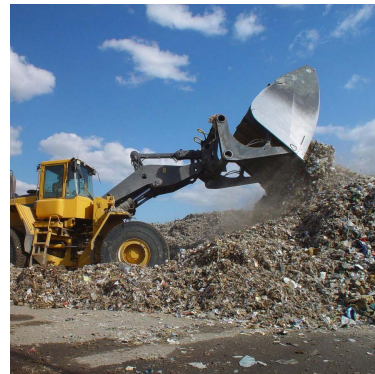


2017 CalRecycle Enforcement Report

February 2, 2021



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Executive Summary

The Department of Resources Recycling and Recovery, known as CalRecycle, has a variety of enforcement responsibilities and programs established under different laws. CalRecycle's enforcement program activities include:

- Oversight of permitted solid waste handling and disposal facilities.
- Enforcement of:
 - Laws and regulations related to the storage, handling, and disposal of waste tires including waste tire hauler and manifest requirements
 - Reporting, record keeping, and operational compliance of certified and registered beverage container collectors, distributors, recyclers, manufacturers, retailers, processors, and dealers
- Evaluation of local enforcement agency (LEA) performance to determine whether LEAs are fulfilling their duties and responsibilities effectively.
- Review and approval of product stewardship and extended producer responsibility plans and annual reports for carpet, paint, and mattress product stewardship programs.
- Enforcement action when:
 - Cities and counties have not implemented diversion programs to achieve their per capita disposal rate
 - Businesses have not met minimum recycled content requirements for covered products
 - Businesses have not met product stewardship and extended producer responsibility requirements for carpet, paint, and mattresses

CalRecycle helps protect public health and the environment by effectively and efficiently managing California's solid waste disposal and recycling efforts. The following are a few highlights from CalRecycle's 2017 programs:

- **Solid Waste:** LEAs have the primary enforcement responsibility over solid waste facilities within the state. To assure facilities in the state are adhering to state standards, CalRecycle reviews each LEA's performance in carrying out its enforcement duties every three years (often referred to as cycles). Based on the 30 LEA evaluations completed between 2015 and 2017 during the seventh evaluation cycle) 22 (or 73 percent) LEAs were fulfilling all, or most, of their responsibilities. CalRecycle put eight LEAs not fulfilling their responsibilities on a corrective action plan until they achieved compliance. Six of the eight corrective action plans were required due to overdue updated closure plans and inspection frequency for Solid Waste Facilities (SWF).

- **Local Government Diversion:** CalRecycle completed three compliance evaluation reviews in 2017, resulting in the issuance of a compliance order to the City of Commerce, Merced Unincorporated, and the City of Ripon. Inyo County, Adelanto, Colton, El Segundo, Lodi, Modesto, Oakdale, and Waterford are still undergoing a compliance evaluation review. Calaveras County Regional Agency, Maywood, and Wasco are still under compliance orders.
- **Minimum Content (Rigid Plastic Packaging Containers):** 60 percent of product manufacturers submitting compliance certifications for the measurement period (2016) were compliant with the regulations. Enforcement actions are pending for three product manufacturers. CalRecycle is continuing to review eight manufacturers from the 2016 measurement period.
- **Beverage Container Recycling:** CalRecycle implemented two new pilot programs in 2017: 1) Processor Oversight, and 2) Imported Materials Reporting and Monitoring. Both programs enhanced enforcement efforts to detect, deter, and mitigate the adverse impacts of illicit program payments.
- **Product Stewardship and Extended Producer Responsibility Programs for Carpet, Mattresses, and Paint Retailers:** Paint retailers continued to demonstrate the highest levels of initial compliance with the law with 76 percent compared to 34 percent of mattress retailers and 58 percent of carpet retailers. Follow-up inspections to noncompliant retailers to evaluate their efforts to correct violations occurred throughout the year.
- **Product Stewardship and Extended Producer Stewardship Organizations:** CalRecycle found Carpet America Recovery Effort (CARE), the stewardship organization for California's used carpet stewardship law, to be noncompliant with statutory requirements for the 2013-2015 reporting periods. On February 13, 2018 the State of California's Office of Administrative Hearings issued a ruling supporting CalRecycle's findings. On April 25, 2018 CalRecycle issued CARE a final decision and a penalty of \$821,250. CARE filed a writ on CalRecycle's final decision. The annual reports and plans for the two other stewardship organizations (paint and mattress) complied with statutory requirements.

Enforcement Program Overview

There are several approaches CalRecycle used to achieve and maintain compliance from the regulated community due to the wide range of laws CalRecycle enforces. CalRecycle focuses its resources on compliance assistance before taking formal enforcement action and imposing penalties. State laws require that CalRecycle enforcement programs have technical assistance, outreach, and training programs. Success depends on effective coordination between government and the regulated community.

CalRecycle has a variety of enforcement responsibilities and programs established under different laws. Each of the laws conveys different levels of enforcement authority, which determine the types of enforcement activities. CalRecycle tracks all enforcement orders online at [CalRecycle Enforcement Orders](#).

CalRecycle has direct authority for enforcing requirements for all programs except solid waste, for which its authority is indirect. To ensure effective statewide enforcement for solid waste programs, CalRecycle certified 60 local enforcement agencies, while CalRecycle is the enforcement agency for six cities and counties.

Partnerships at various levels of state and local government enhance CalRecycle's enforcement activities. In 2017, CalRecycle provided 38 grants to local tire enforcement agencies to inspect waste tire sites and issue violation notices. Partnerships with stewardship organizations enable the private sector to design and manage statewide extended producer responsibility programs for their respective industries. For some enforcement and criminal prosecution activities in the beverage container and e-waste programs, CalRecycle has interagency agreements with the California Department of Food and Agriculture, Department of Justice, Department of Toxic Substances Control, and the Office of the Attorney General.

CalRecycle also participated in the second CalEPA Compliance Assistance and Enforcement Initiative that targeted multi-agency inspections and compliance assistance in Boyle Heights and Pacoima (Los Angeles area). In addition to facility inspections, CalRecycle conducted three waste tire hauler training workshops in Spanish and English.

Purpose and Scope of Report

CalRecycle created this report detailing CalRecycle's enforcement activities in part to carry out the reporting requirements for CalRecycle (Public Resources Code section 40507) and CalEPA (Government Code section 12812.2 I). It summarizes CalRecycle's wide-ranging enforcement activities for calendar year 2017 and provides a snapshot of enforcement data for the last five years.

Program Descriptions and Enforcement Activity Data

Waste Tire Enforcement

Program Description

CalRecycle regulates waste tires to prevent or mitigate the negative impacts of tires on public health, safety, and the environment, and to provide a level playing field for California businesses engaged in the collection, transportation, processing, storage, and disposal of waste tires. Enforcement efforts focus on two related fronts: waste tire haulers and handlers, and waste tire storage/processing facilities. The regulated tire community documents transactions among the waste tire generator, hauler, and storage facilities on a manifest form and submits them electronically.

Waste Tire Haulers, Generators, and Permitted Facilities

There are slightly more than 30,600 waste tire-related businesses in California. Of those, 44 are required to have a waste tire permit issued by CalRecycle to operate. A total of 1,597 businesses are registered with CalRecycle and authorized to transport nine or more tires throughout the state. The remaining businesses are required to meet state standards for waste tire storage and handling and recordkeeping requirements to assist with tracking movement of waste tires within the state. The entities that are enrolled with the CalRecycle Waste Tire Program include tire-related businesses such as new and used tire dealers, car dealers, fleet operators, repair shops, dismantlers, re-treaders, cement kilns, and agriculture users. In 2017, the number of regulated entities remained virtually the same as the prior year in all categories including:

- 1,597 registered waste tire haulers
- 44 permitted waste tire facilities (29 minor facilities and 15 major facilities)
- 28,994 other waste tire-related businesses

Enforcement Activity Data

Inspections

A local tire enforcement agency (TEA) or CalRecycle staff inspect waste tire hauler and active tire generators at regular intervals, as established by the [Five-Year Tire Plan](#). CalRecycle conducts all inspections of permitted tire facilities. Inspections ensure ongoing compliance with state standards during operation and prior to issuing waste tire facility permits. Inspection frequency is as follows:

- Permitted facilities – annually.
- Registered haulers – every two years.
- Active generators – every three years.

Waste tire inspectors conducted a total of 16,037 inspections statewide in 2017 (see Figure 1). CalRecycle staff conducted 1,758 inspections or 11 percent of all inspections, and local TEAs conducted 14,279 inspections or 89 percent. Overall inspections conducted declined by less than 10 percent in 2017, as less TEA inspections were conducted since one county did not apply for a TEA grant to be a part of the program during 2017.

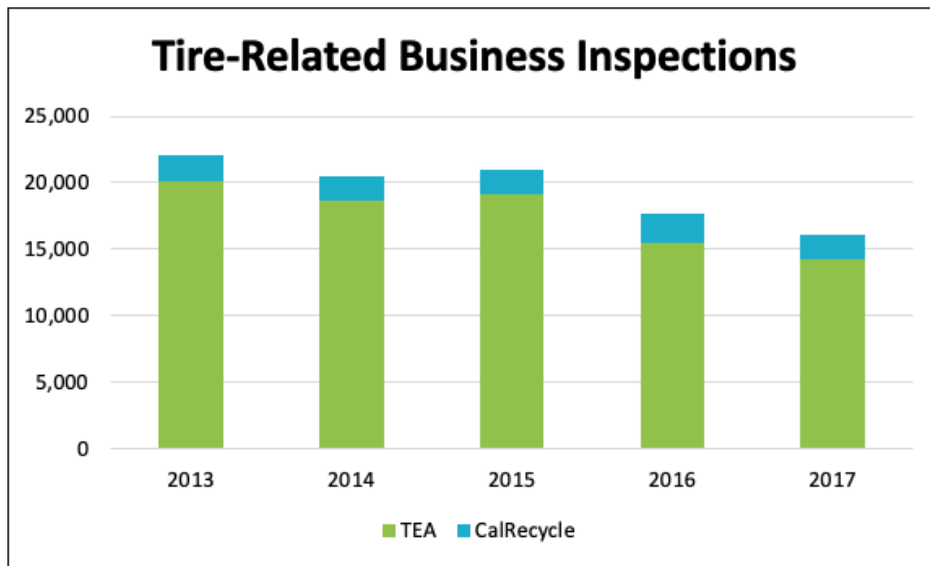


Figure 1 - 2017 TEA and CalRecycle Waste Tire Enforcement Inspections. See Appendix 1 for accessible source data.

Enforcement Activities: All Waste Tire Businesses

Of the 16,037 inspections of all tire-related businesses and facilities, TEAs or CalRecycle issued 554 Notices of Violation (NOV), 453 of which were issued to tire businesses, 90 were issued to registered haulers, and 11 of which were issued to permitted facilities. Nearly all corrected the violations by the cited compliance date. However, some facilities required escalated enforcement. Three (3) entities were issued clean up and abatement orders (CAOs) and six (6) entities were served with administrative complaints (AC, see Figure 2).

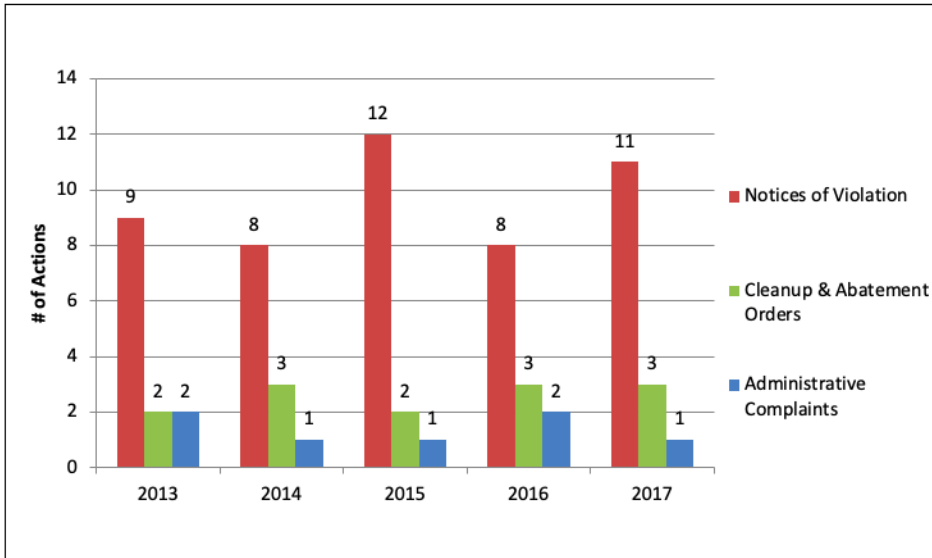


Figure 2 - Enforcement Actions and Administrative Complaints chart that summarizes NOVs, CAOs, and ACs issued by CalRecycle against permitted waste tire facilities. See Appendix 1 for accessible source data.

Escalated Enforcement Actions: Waste Tire Hauler Registration and Manifest

CalRecycle utilized the streamlined penalty (SLP) process for a total of 21 waste tire hauler cases in 2017. Of that total, 16 were related to noncompliance with manifest requirements, four (4) were unregistered hauling cases, and 1 was a combination of both unregistered hauling and hauler noncompliance manifest issues (see Figure 3). The total number of unregistered hauler cases continues a downward trend that began in 2015, likely due to increased hauler outreach and education efforts.

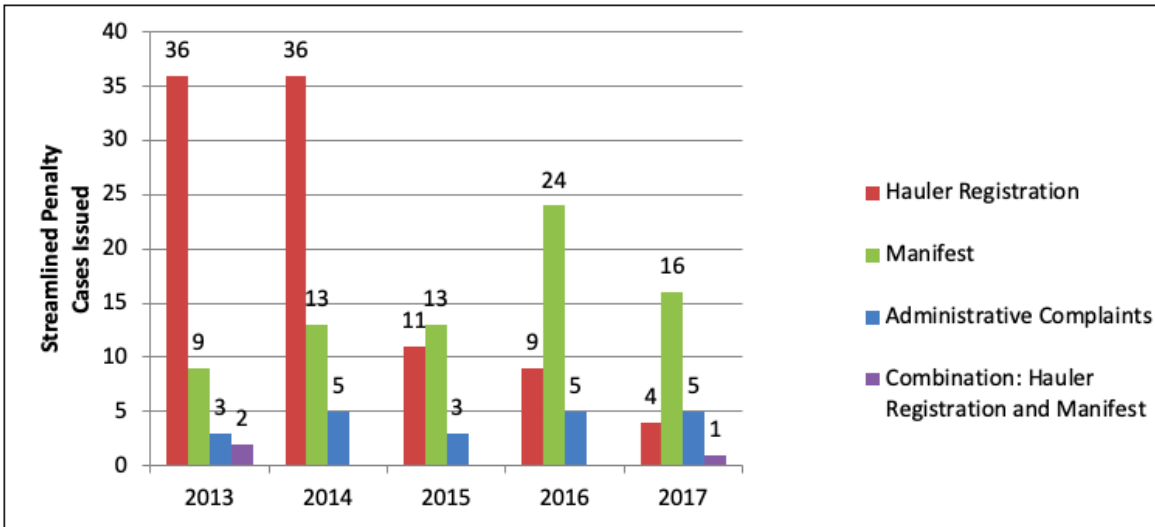


Figure 3 - Streamlined Penalties by Violation Category and Administrative Complaints. See Appendix 1 for accessible source data.

Solid Waste Facilities Enforcement

Program Description

Solid waste enforcement programs protect public health and safety, and the environment, and ensure a level playing field for solid waste businesses. CalRecycle has oversight authority for solid waste handling, processing, and disposal facilities or operations. Direct authority to ensure proper operation of facilities and operations resides with 60 state-certified LEAs and with CalRecycle as the enforcement agency (EA) for three cities and four counties with no designated LEA. Those include the cities of Berkeley, Paso Robles, and Stockton and the counties of San Benito, San Luis Obispo, Santa Cruz, and Stanislaus. CalRecycle has the ability to take direct enforcement if LEAs do not choose to or are not adequately performing enforcement duties, or in areas where CalRecycle is the EA.

The LEAs and CalRecycle collaboratively developed a [“compliance first”](#) enforcement approach that emphasizes education and cooperation between the LEA and operators to deter problems before considering formal enforcement action or penalties.

The [Compliance Targeting Strategy](#) (December 2007) builds upon those developed principles to provide direction for CalRecycle staff on focusing resources to provide early assistance to LEAs to cooperatively resolve chronic cases.

Solid Waste Disposal Facilities and Operations

In 2017, California’s solid waste disposal infrastructure included 589 active, permitted solid waste facilities and 712 active operations. Operations are distinguished from facilities in that they do not require a permit. However, operations are required to send a “notification” to the LEA and are inspected by the LEAs, although less frequently than permitted facilities.

California’s solid waste management infrastructure includes the 1,301 active facilities and operations listed below (see Figure 4).

- **Active permitted facilities (589)**
 - 328 waste transfer and processing facilities
 - 109 composting facilities
 - 144 disposal facilities
 - 3 transformation facilities
 - 3 in-vessel digestion facilities
 - 2 engineered municipal solid waste facility (eMSW)

- **Authorized operations (712)**
 - 418 waste transfer and processing operations
 - 268 compostable material handling operations
 - 24 inert fill operations
 - 2 in-vessel digester operation

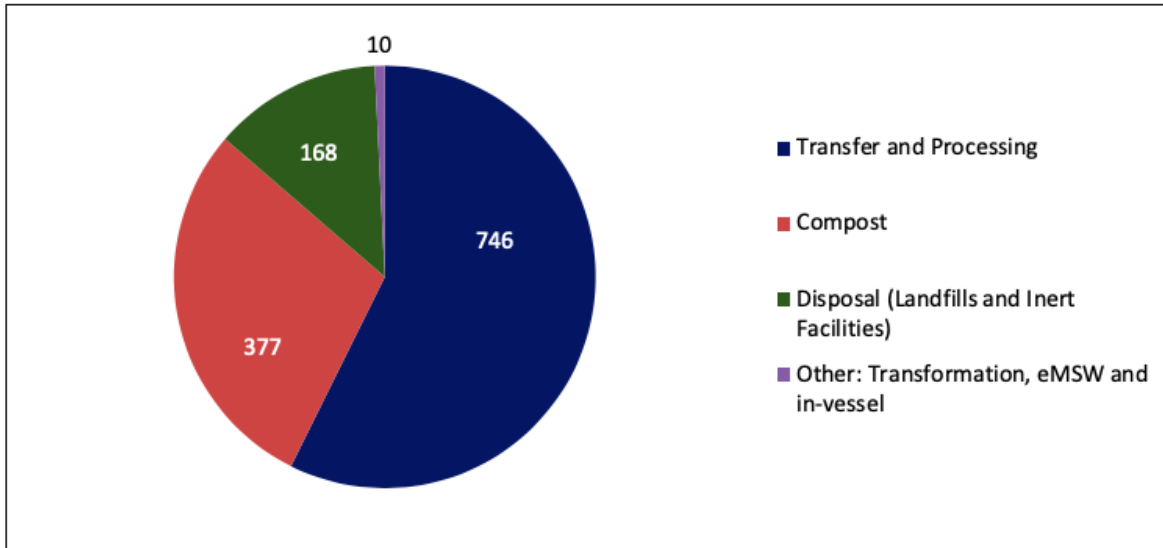


Figure 4 - Solid Waste Facilities and Operations: 2017. See Appendix 1 for accessible source data.

Enforcement Activity Data

Solid Waste Inspections

LEAs regularly inspect facilities and operations to enable early detection of noncompliance with regulations and permit conditions. Figure 5 summarizes the number of inspections performed by the enforcement agency—either the LEA, or CalRecycle (for cities or counties with no designated LEA). Inspectors conducted 13,522 inspections in 2017, slightly more than in 2016. LEAs conducted 12,782 inspections and CalRecycle conducted 740.

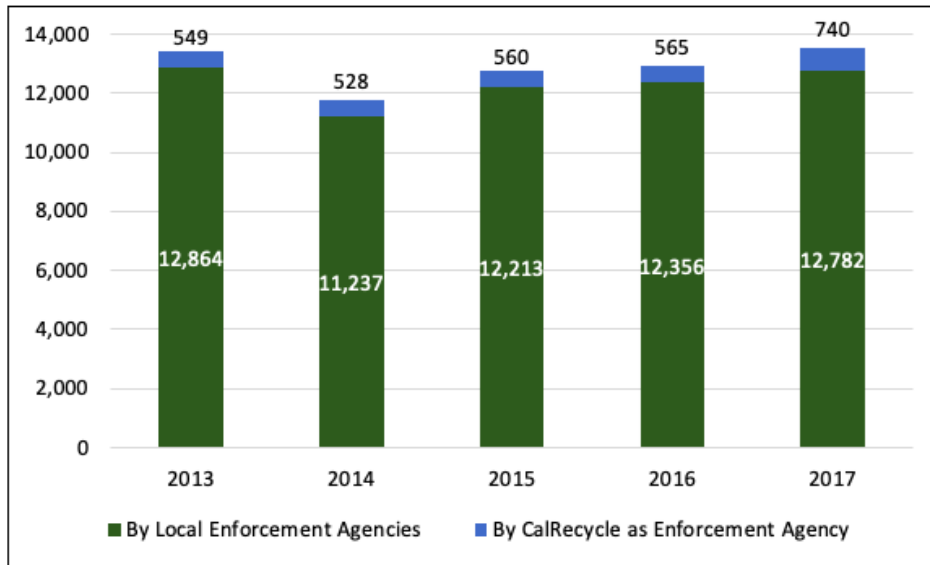


Figure 5 - Solid Waste Facility Inspections. See Appendix 1 for accessible source data.

The total number of violations for active facilities increased from 1,302 in 2016 to 1,427 in 2017. Tables 1, 2, and 3 below list the most often cited violation categories for each facility type.

Violations by facility type include:

- Disposal facilities (landfills) - 33 percent (474)
- Compost facilities - 22 percent (324)
- In-vessel digestion facilities- <1 percent
- Waste transfer and processing facilities - 43 percent (625)
- Other – 2 percent

Disposal Facilities (Landfills): Thirty-three percent (474) of the total violations were at landfills. Of the 474 violations, gas monitoring and control moved up to the most frequently cited violation in 2017. This closure plan violation was a factor in several LEAs being placed on corrective action plans as noted later in this report. Table 1 summarizes most often cited violation categories for landfills.

Table 1 - Landfill Violations

Violations	Percent	Landfill Violation Category
130	27%	Gas Monitoring and Control
57	12%	Operator Compliance with Permit Terms and Conditions
44	9%	Closure Plan
20	4%	Daily Cover
18	4%	Litter Control
205	44%	Other

Compost Facilities: Twenty-two percent (324) of the total violations were at compost facilities. The 324 compost facility violations are fairly evenly distributed across a variety of regulations. Table 2 summarizes the most often cited violation categories for compost facilities.

Table 2 - Compost Facility Violation

Violations	Percent	Compost Facility Violation Category
51	16%	Fire, Prevention, Protection, and Control
39	12%	Operator Complies with Terms & Conditions
39	12%	Vectors, Litter, Hazard, Nuisance, Noise, or Dust
36	11%	Chip and Grind Storage Limit Time Exceeded
28	9%	Report of Compost Site Information
131	40%	Other

In-Vessel Digestion Facilities: Less than one percent of total violations occurred at in-vessel facilities in 2017, which is consistent with the fact that there are only five facilities permitted under this new category. The most often cited violations were for leachate control and odor control issues.

Waste Transfer and Processing Facilities: Forty-three percent (625) of the total violations were at waste transfer and processing facilities. The total number of violations increased from 441 in 2016 to 625 in 2017.

Table 3 summarizes the most often cited violation categories for waste transfer and processing facilities. The majority of violations continues to relate to compliance with permits and record keeping requirements.

Table 3 - Transfer and Processing Facilities Violations

Violations	Percent	Transfer and Processing Facilities Violation Category
52	8%	Operator Compliance with Permit Terms and Conditions
43	7%	Recordkeeping Requirements
40	6%	Solid Waste Removal
35	6%	Operator Authorized by SWF Permit
31	5%	Cleaning
424	68%	Other

CalRecycle Oversight Inspections and Investigations

In addition to routine inspections, CalRecycle is required to conduct oversight inspections, which includes 18-month inspections of landfills, discretionary inspections, and pre-permit inspections.

In 2017, CalRecycle conducted 122 oversight inspections (18-month, pre-permit, and discretionary) to ensure consistent statewide application of standards and regulations and to evaluate LEA performance.

Sixty-nine percent of oversight inspections (84) were the mandated 18-month inspections of landfills. The remaining 31 percent split between discretionary inspections (17) and pre-permit inspections (21) (see Figure 6).

Pre-permit inspections determine if a proposed permit is consistent with the state minimum standards. These inspections vary based on the number of new or revised permits issued. During 2017, CalRecycle conducted pre-permit inspections at 12 transfer and processing facilities, nine landfills, two compost facilities, and one construction-and-demolition facility.

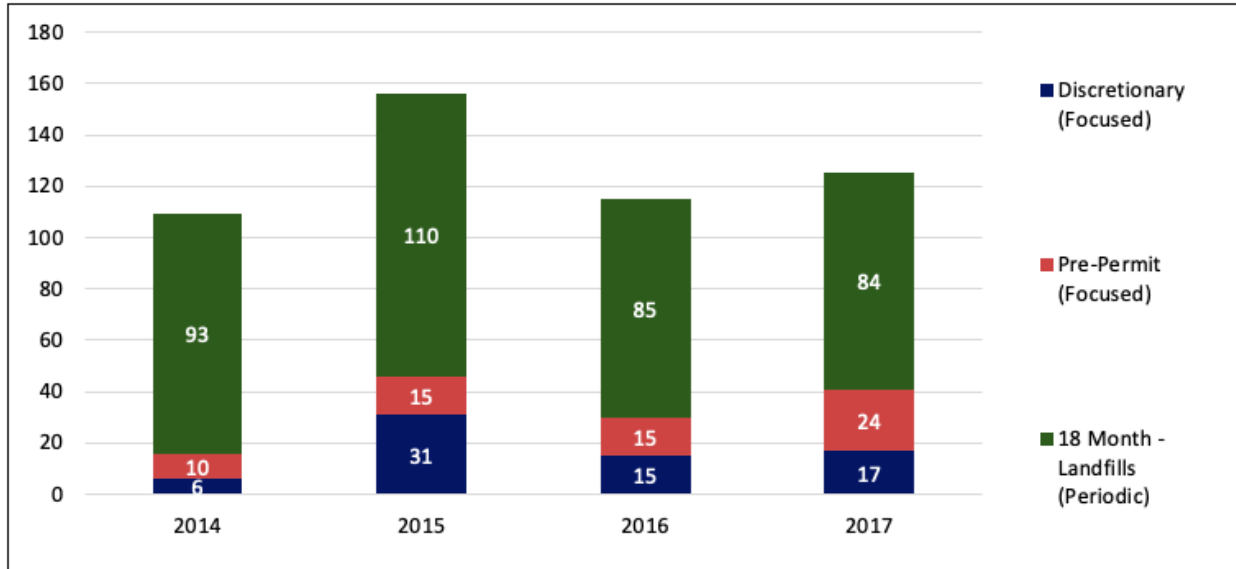


Figure 6 - CalRecycle Oversight Inspections. See Appendix 1 for accessible source data.

CalRecycle conducted 17 discretionary inspections in 2017, including one landfill, seven transfer and processing facilities, one compost facility, two chip-and-grind and construction-and-demolition facilities, three recycling centers, two in-vessel and one closed landfill.

CalRecycle conducts discretionary inspections to evaluate the performance of LEAs, but they are usually based on the site's enforcement history, requests from the LEA, or complaints that have been submitted through the CalEPA referral process. In 2017, CalRecycle staff investigated 9 complaints.

Enforcement Actions

Most violations are corrected within a month or two and do not require formal enforcement action. On-going noncompliance with state standards and permit conditions is tracked by CalRecycle in several ways:

1. CalRecycle maintains an [Inventory of Facilities Violating State Minimum Standards, which](#) lists solid waste facilities with chronic violations of one or more state minimum standards for solid waste handling and disposal.
2. CalRecycle tracks enforcement orders.

Figure 7 summarizes enforcement actions taken against facilities that chronically violate state minimum standards and/or permit conditions.

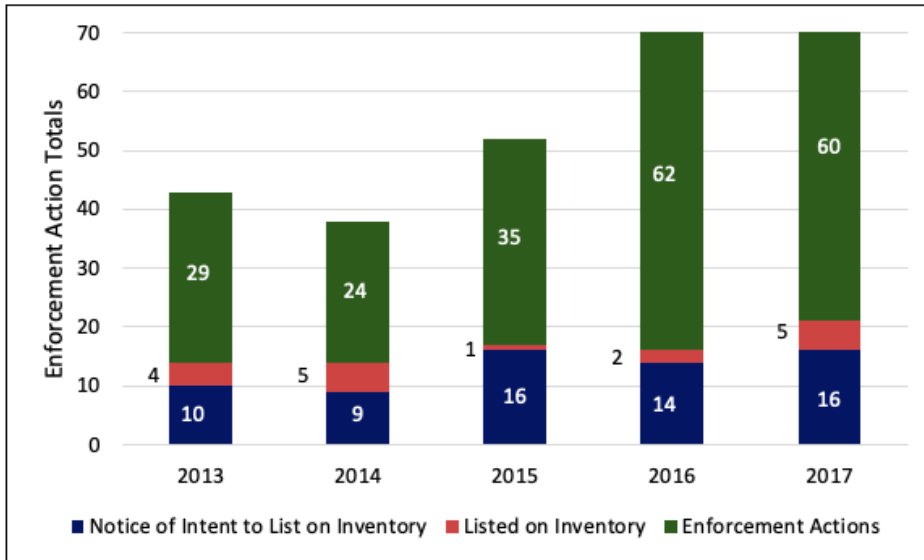


Figure 7 - Solid Waste Facility Enforcement Actions. See Appendix 1 for accessible source data.

During 2017, sixteen facilities received Notices of Intent to List, notifying them that CalRecycle would be listing them on the Inventory of Facilities Violating State Minimum Standards for repeat violations. Of the sixteen facilities receiving a Notice of Intent, only five were Listed on the Inventory because the other facilities corrected their violations.

Another way CalRecycle tracks compliance is by tracking the number of facilities that are under active enforcement orders. During 2017, 60 solid waste facilities, primarily landfills, were under enforcement orders. Enforcement orders include cease and desist orders, notices and orders, compliance schedules, stipulated agreements, and penalty orders.

LEA Evaluations

CalRecycle evaluates each LEA's performance approximately every three years and then reports data on a three to four-year cycle. The last completed cycle was the sixth cycle, which was primarily conducted between 2012 and 2016. The seventh cycle began in 2016. LEA evaluation cycles can overlap, as some evaluations require additional time to obtain documentation or allow for corrective actions. Staff completed 19 evaluations in 2017 as part of the seventh cycle. Staff are also working on issuing or monitoring corrective action plans and reviewing LEAs for the remainder of the seventh cycle.

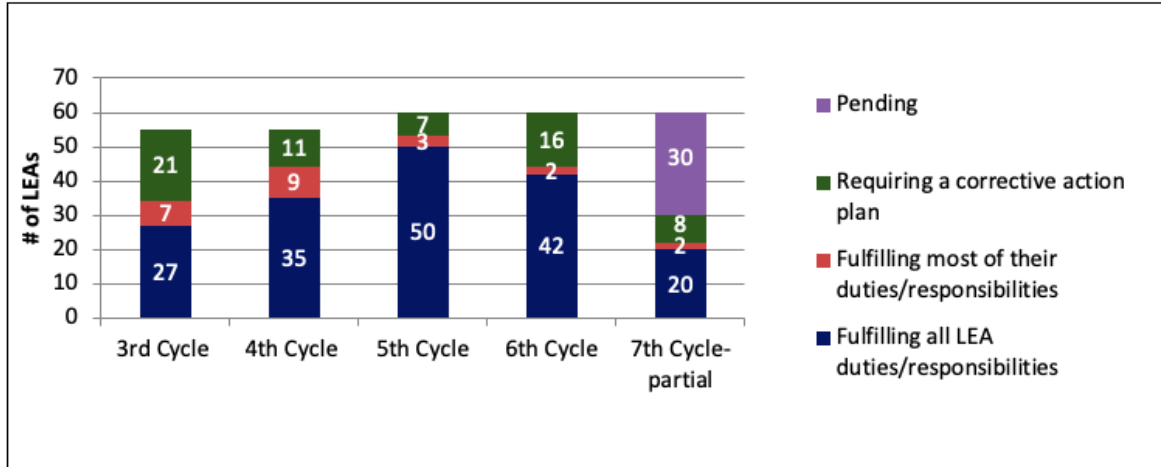


Figure 8 - LEA Evaluation Results by Cycle. See Appendix 1 for accessible source data.

For the LEA evaluations completed in the seventh cycle, 73 percent (22) of the LEAs were fulfilling all, or most, of their responsibilities and 27 percent (8) were required to complete corrective action plans. Two LEAs completed these corrective action plans during 2017 (Tuolumne and San Francisco; see Figure 8). Napa, Modoc, and Plumas counties are making progress toward the completion of existing workplans and taking steps to remediate issues identified in their evaluations.

Local Government Diversion Enforcement

Program Description

Local governments submit an annual report to CalRecycle summarizing the implementation of their waste diversion plans to comply with their respective per capita disposal targets. CalRecycle reviews each local government’s progress in implementing its unique diversion programs and its progress in sustaining or achieving compliance. Based on that review, CalRecycle may refer local governments for a compliance evaluation review. The number of local governments referred is generally less than 1 percent. If a more thorough analysis reveals a jurisdiction is not meeting the “good faith” standard for implementing its diversion programs or for reaching per capita disposal targets, CalRecycle will issue a compliance order. If the local government fails to fulfill its implementation plan to correct the program deficiencies, then the local government will be subject to penalties.

Enforcement Activity Data

Compliance Evaluation Reviews

CalRecycle oversaw fourteen compliance evaluations during 2017 (this includes eleven jurisdictions referred to enforcement in March 2017). Of the eleven jurisdictions referred in March 2017, staff issued compliance orders to three local governments, including the City of Commerce, Merced Unincorporated, and the City of Ripon. The remaining eight referrals—including Inyo County, City of Adelanto, Colton, El Segundo, Lodi, Modesto, Oakdale, and Waterford—were still undergoing a compliance evaluation review at the end of 2017. In addition, Calaveras County Regional Agency, Maywood, and Wasco were still under compliance orders issued in previous years (Figure 9).

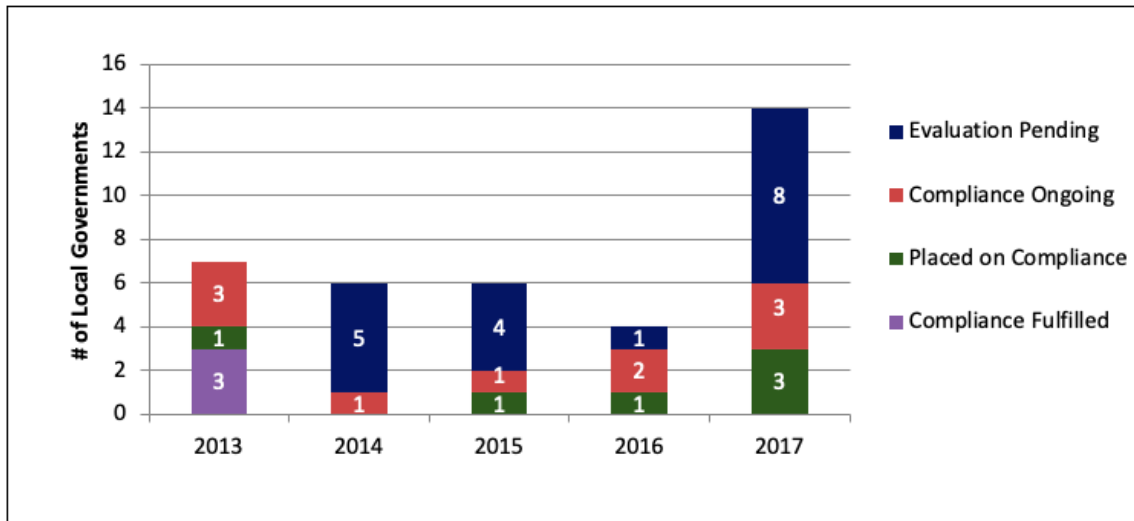


Figure 9 - Local Government Diversion Programs Enforcement Actions by Year. See Appendix 1 for accessible source data.

Minimum Content Program: Rigid Plastic Packaging Containers

Program Description

CalRecycle requires product manufacturers that sell certain products in rigid plastic packaging containers (RPPCs) in California to reduce the amount of plastic disposed in landfills and to increase the use of post-consumer recycled plastic resin in the manufacturing of new packaging containers. Some rigid plastic packaging containers are exempt from this law due to the type of product they hold, such as food, drugs, toxic, or hazardous products. To ensure compliance with the law, there is a three-phase process: registration, pre-certification, and compliance certification. The phases are continuous and overlapping.

Enforcement Activity Data

Registration: CalRecycle registered 30 additional product manufacturers during 2017; bringing the total registered product manufacturers to 1,428.

Pre-Certification: The pre-certification phase consists of CalRecycle notifying selected product manufacturers one-year in advance that they may be selected to certify compliance. The advance notice provides product manufacturers the opportunity to review RPPC requirements to ensure that their RPPCs comply with the law. Each year CalRecycle randomly selects registered product manufacturers to send a pre-certification notice. In 2013, CalRecycle staff sent notices to 54 product manufacturers notifying them that they may be selected to certify compliance for the 2018 measurement period (See Figure 10).

Compliance Certification

During the compliance certification phase, CalRecycle selects a number of registered product manufacturers, that received a pre-certification notice, to submit proof that its products sold or offered for sale in California are in compliance. Selected product manufacturers must provide documentation that their containers meet one of several compliance options including, but not limited to, reducing the container weight by 10 percent or using 25 percent postconsumer material in the container.

CalRecycle notified and received 20 product manufacturer compliance certifications by the April 2017 due date. The 2017 submittals included data for January 1 thru December 31, 2016 (2016 measurement period).

Based on the analysis completed in 2017, for the 2016 measurement period:

- Four product manufacturers were no longer selling products in RPPCs or have exempt products.
- Eight product manufacturers submitted documentation supporting compliance with RPPC requirements.
- Eight product manufacturers submitted documentation in 2017 and CalRecycle's compliance determination review is on-going and will be reported in a subsequent CalRecycle Enforcement Report.

In preparation for next year's compliance certification for the 2017 measurement period, CalRecycle randomly selected 35 product manufacturers from the pre-certification list to provide compliance certifications (this is an increase of 15 product manufacturers from the 20 that submitted this year).

For the previous measurement periods, CalRecycle prepared three enforcement actions on product manufacturers found to be in violation. The resolution of these enforcement actions and will be reported in a subsequent CalRecycle Enforcement Report.

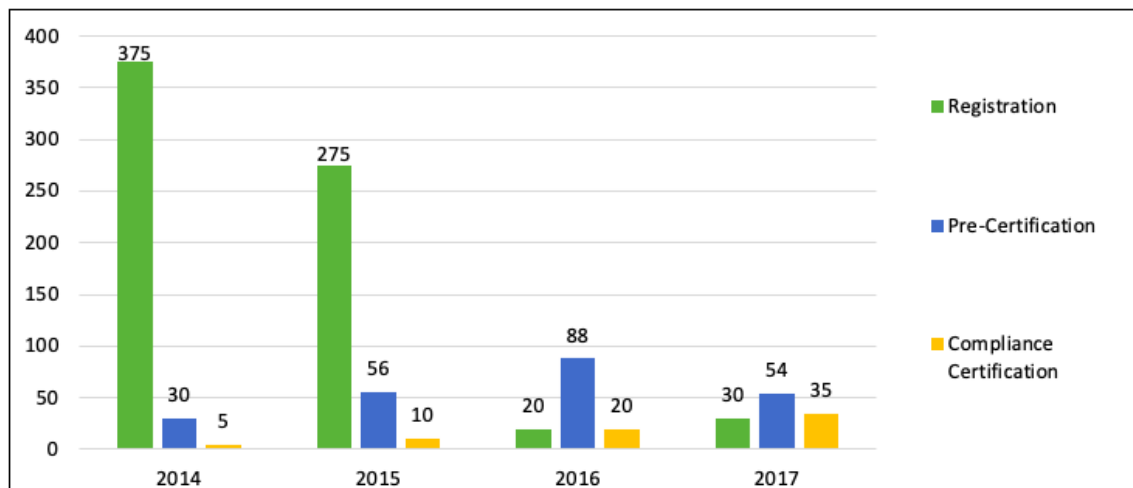


Figure 10 - Rigid Plastic Packaging Container. See Appendix 1 for accessible source data.

Figure 10 shows that after the passage of the RPPC regulations in 2013, the RPPC program initially focused on registering businesses in the new program. Once businesses were registered, resources shifted to sending pre-certification letters and reviewing compliance certification documentation from businesses.

Beverage Container Recycling Enforcement

Program Description

Californians recycled an average of more than 51 million beverage containers each day in 2017, totaling about 18.4 billion beverage containers. To fund California’s Beverage Container Recycling Program, CalRecycle collects redemption payments and processing fees from beverage distributors and manufacturers for each CRV-eligible aluminum, glass, plastic, and bimetal beverage container sold in California. Consumers pay a deposit at the store for each eligible beverage container and can redeem their used containers at a recycling center or participating dealer.

Recyclers sell the used eligible empty beverage containers to processors. Recyclers are responsible for verifying that the containers qualify for CRV before claiming a refund from the processor.

The processor requests reimbursement from CalRecycle to cover the payments it makes to recyclers and other program participants. If recyclers or processors submit fraudulent or improperly documented claims, CalRecycle can deny or reduce payments. Program fraud associated with the illegal redemption of empty beverage containers imported into California is a significant threat to the solvency of the fund.

The network of program participants for beverage container recycling includes:

Beverage Container Distribution

- Retailer Beverage Dealers 30,000
(This is an estimate since dealers are not required to register)
- Beverage Manufacturers 1,884
- Distributors 2,015

Collection/Processing

- Recycling (Buy-Back) Centers 1,578
- Curbside 612
- Collection/Drop-Off Programs 197
- Processors 180
- Community Service Programs 193

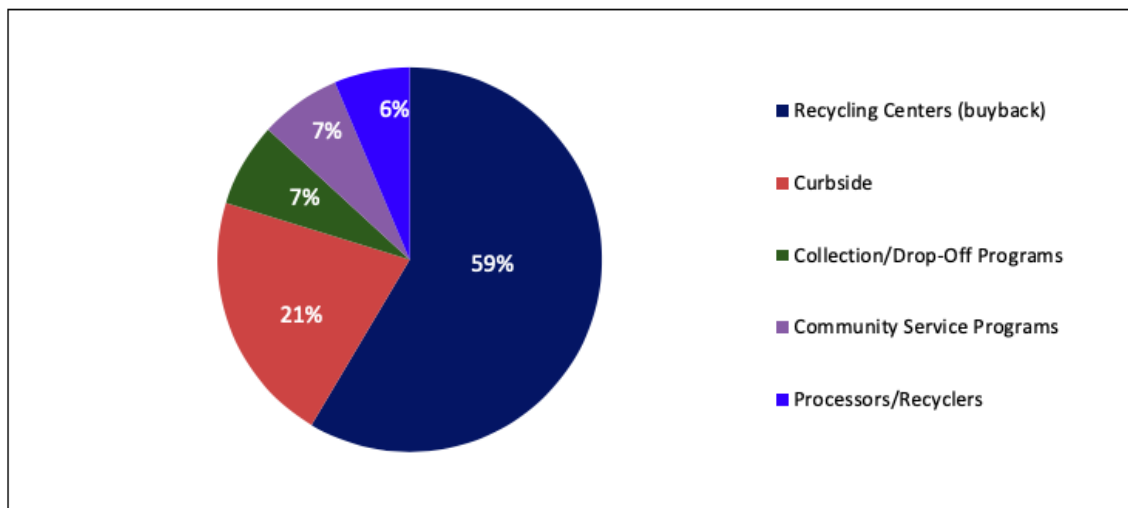


Figure 11 Beverage Container Recycling Infrastructure Collection/Processing (2017). See Appendix 1 for accessible source data.

The percentage of certified or registered program participants in each category was essentially the same in 2017 as in 2016. However, the total number of recycling centers decreased by approximately 6 percent (See figure 11).

Enforcement Activity Data

Recycling Center Probationary Reviews

Recycling centers are on probation for the first two years of operation but can be renewed on probation based upon a file review or site visit. CalRecycle reviewed 608 probationary certificates during 2017. (See figure 12.) Based upon a standard risk assessment, staff members determined whether to conduct a compliance history and file review or a site visit. Staff conducted approximately 70 percent of probationary reviews through the compliance history and file review. The number of on-site probationary reviews remained consistent with 2016.

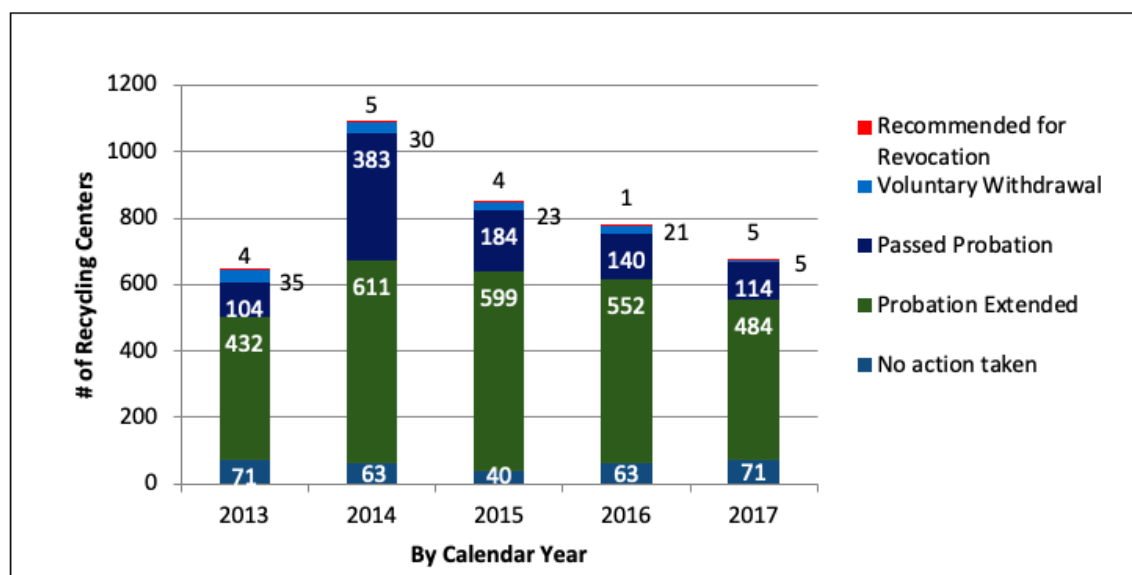


Figure 12 Recycling Center Probationary Reviews: Recycling Centers. See Appendix 1 for accessible source data.

Figure 12 summarizes all actions resulting from probationary reviews. In addition to these actions, auditors assessed \$16,177 in restitution, civil penalties, and interest. The next two figures summarize actions taken by the type of review: compliance history and file review (See figure 13) or site visit (See figure 14).

- Compliance History and File Review:** Staff members conducted compliance history and file reviews for 435 recycling centers in 2017. Approximately 73 percent of the recycling centers reviewed had their probationary certificates extended for another year (319 recycling centers), which is a 1 percent increase from 2016. Eleven percent of recycling centers reviewed, or 46 recycling centers, passed probation, which was a decrease from 2016. Five recycling centers voluntarily decertified from the program or were abandoned. No action was taken at 65 non-recycling center sites that were up for review (See figure 13).

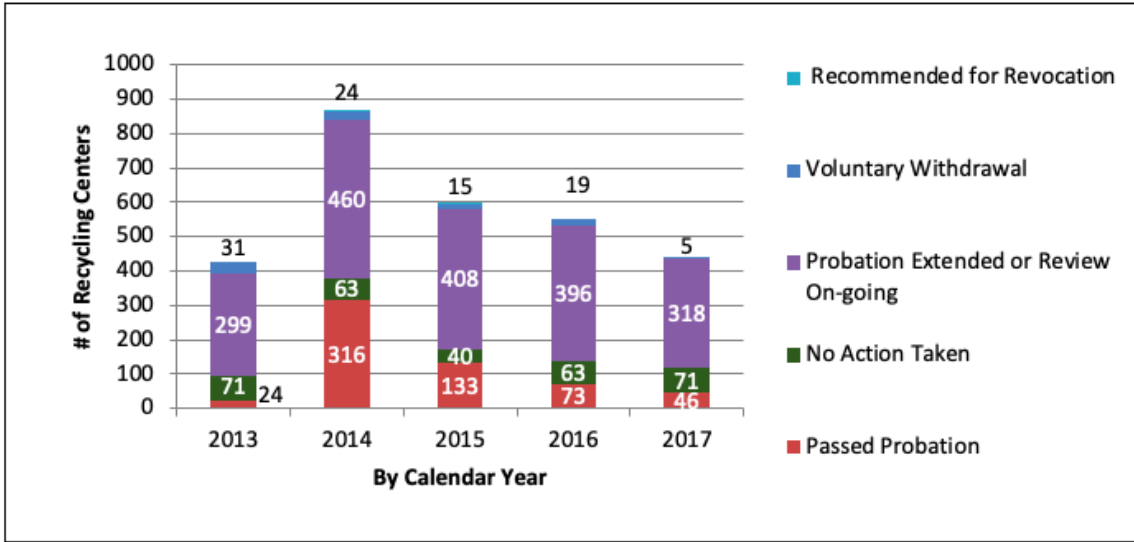


Figure 13 Compliance History/File Review: Actions Taken. See Appendix 1 for accessible source data.

- On-Site Review:** CalRecycle conducted on-site reviews at 239 recycling centers. Just over 69 percent had their probationary certificates extended for another year (166 recycling centers), which was slightly lower than in 2016. Another 28 percent passed probation (68 recycling centers). No recycling centers voluntarily decertified and none were abandoned. Five recycling centers had its probationary certificate recommended for revocation (See figure 14).

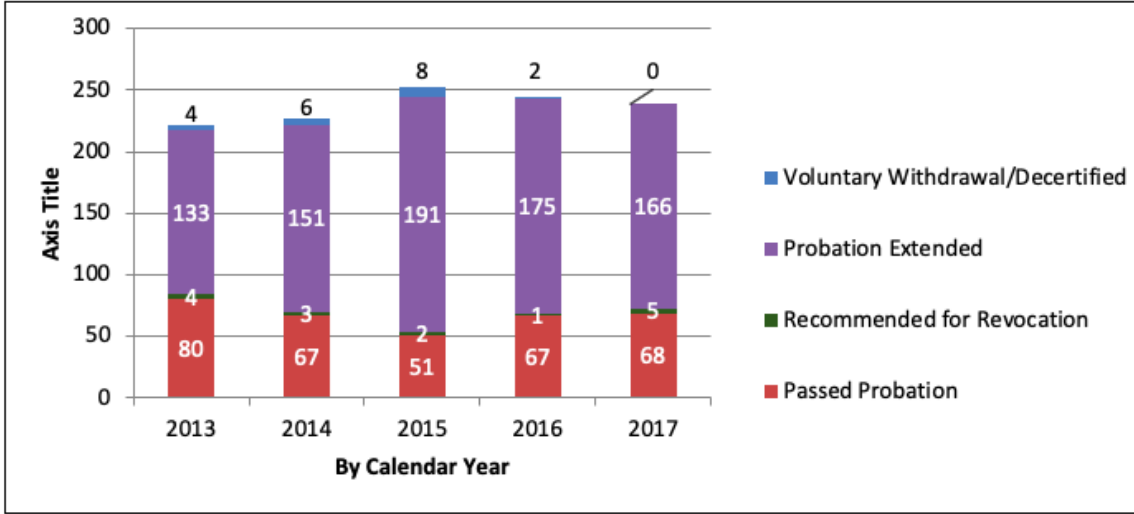


Figure 14 On-Site Reviews: Actions Taken. See Appendix 1 for accessible source data.

Handling Fee Reviews

Of the 88 handling fee applications reviewed in 2017, CalRecycle denied 54, which represents a 22 percent decrease compared to 2016. CalRecycle may deny handling fee applications when consumer transaction logs and receipts do not support participant's claims, participant is not accepting all material types for redemption, participant does not provide records, and other violations. Of the applications reviewed, handlers claimed \$744,592, but CalRecycle denied 46 percent (\$343,154). In 2017, handling fee claim reviews also yielded \$3,700 in restitution and civil penalties, which was 60 percent less than in 2016.

Recycling Center Inspections

CalRecycle inspects each certified recycling center at least once annually to ensure compliance with program requirements.

Recycling center inspections increased in 2017. Staff members conducted 3,586 inspections during 2017 (See figure 15).

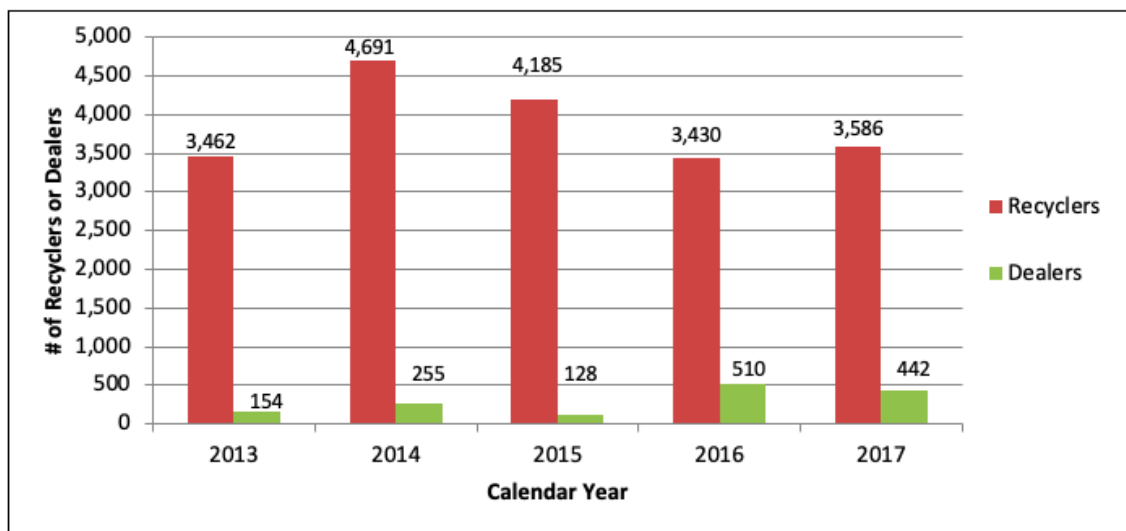


Figure 15 Recycler Center and Dealer Inspections. See Appendix 1 for accessible source data.

During 2017, CalRecycle issued 726 notices of noncompliance (NONC) to recycling centers. Twenty percent of recycling centers received NONCs— essentially the same percentage as in 2016 (See figure 16). There were 617 notices of violations issued, which is 7 percent higher (as a percentage of total inspections) than in 2016.

Assessments continue to rise each year: CalRecycle assessed \$197,900 in civil penalties on noncompliant recycling center operators because of the inspections—a 21 percent increase in penalties assessed compared to 2016.

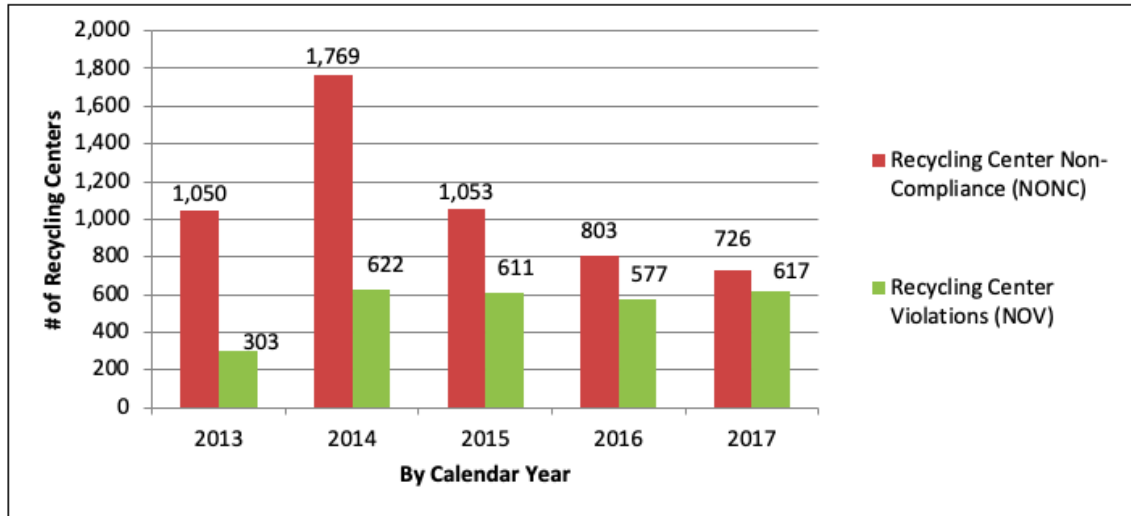


Figure 16 Recycling Center Inspections: Enforcement Actions. See Appendix 1 for accessible source data.

Dealer Inspections

In areas where there is no certified recycling center, retail beverage dealers such as supermarkets, liquor stores, and mini-marts may be required to redeem beverage containers or pay an in-lieu fee in order to provide convenient redemption for consumers. In these cases, inspectors conduct test sales to determine if the dealer is redeeming empty beverage containers as required. Dealer inspections decreased by 13 percent since 2016 with 442 dealer inspections conducted (See figure 15).

During 2017, there were 249 NONCs issued to dealers, which is 23 percent more (as a percentage of total inspections) than in 2016. There were only 45 violations issued. That represents a decrease of 33 percent (as compared to total inspections) from 2016. (See figure 17). CalRecycle assessed civil penalties totaling \$13,150 on noncompliant dealers because of the inspections.

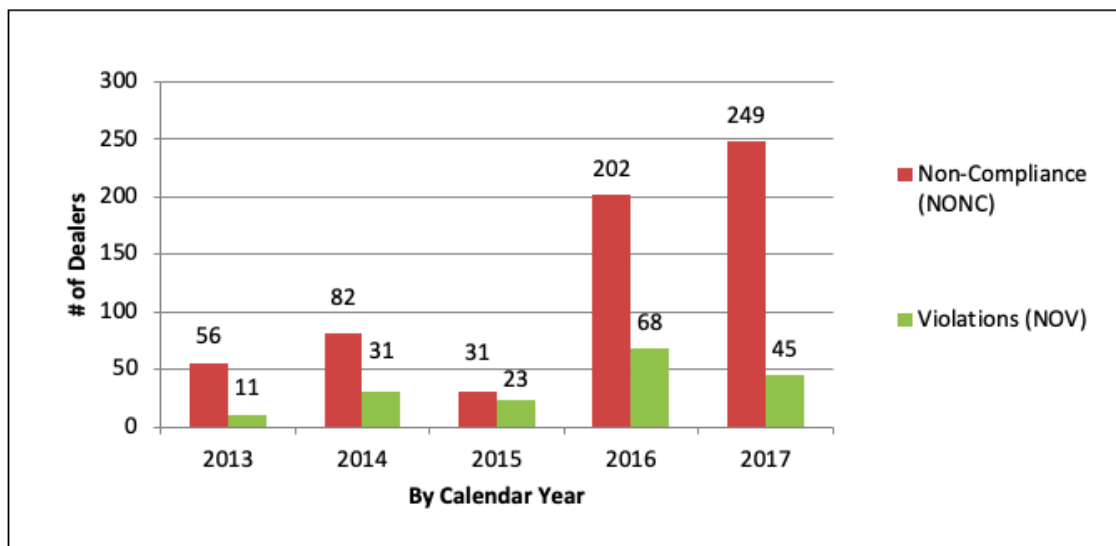


Figure 17 Dealer Inspections: Enforcement Action. See Appendix 1 for accessible source data.

Processor Oversight and Imported Materials Investigations

CalRecycle initiated 37 processor investigations in 2017 and closed 37 cases. Of the 1663 load inspections and reviews conducted in 2017, CalRecycle denied 6 and reduced 20 of the loads. CalRecycle denied loads for pieces of broken, densified bales or biscuits of aluminum beverage containers found within the load, falsification of supporting documents, and out-of-state material. When CalRecycle denies a load, CalRecycle does not issue CRV payment for any portion of the claim. Loads are reduced by the investigations staff for recordkeeping violations and or ineligible material found in the load. Ineligible material is not eligible for CRV payment. When a load is reduced, a corresponding portion of the material claimed as CRV is denied.

In 2017, CalRecycle received 5,318 imported material reports (IMR) from CDFA. This information was then data entered and reviewed for both accuracy and legitimacy.

Investigations, Accusations, and Criminal Prosecution

CalRecycle conducts investigations as a result of risk analysis (e.g., when recycling centers experience a sudden spike in volume of material purchased), tips, referrals, or inspections. Staff members conduct administrative investigations to evaluate the validity and eligibility of reimbursement claims, look for possible document falsifications, or investigate potentially fraudulent claims. CalRecycle’s forensic document reviews can lead to the recovery of unsubstantiated and illegal payments. Findings can result in placing pre-payment controls on suspect participants, administrative civil penalties, restitution, and revocation of the recycler’s certification for non-compliant or fraudulent activities.

In 2017, CalRecycle opened 371 investigations and closed 380 investigations. The number of investigations closed does not correlate directly with those initiated, as some cases take more than one year to resolve. Investigations include fraud detection reviews, claimed volume reports, recycler leads, call center cases, and forensic reviews. Results from completed investigations during 2017 include:

- 1 processing facility certification recommended for suspension
- 8 recycling center certifications recommended for revocation
- 134 notices of noncompliance issued
- 52 notices of violation issued

CalRecycle does not have statutory authority to conduct criminal investigations or criminally prosecute. When CalRecycle investigations reveal potential criminal activity, staff members refer the case to the California Department of Justice (DOJ) for further investigation and subsequent prosecution, if warranted, by the state Attorney General. In 2017, CalRecycle referred 36 cases to DOJ for further investigation.

During 2017, DOJ initiated 24 investigations, closed 22 investigations, and made 31 arrests. The section below summarizes some of the 2017 cases.

Border Arrests

In January 2017, agents at a CDFA border checkpoint in Blythe, California, inspected a tractor-trailer driven by Eduardo Herrera, 27, of Corona. Herrera failed to produce a bill of lading and claimed his 53-foot trailer was empty. Agents with the DOJ Recycling Fraud Team apprehended the truck driver as he attempted to smuggle nearly 7,000 pounds of used beverage containers from Phoenix, Arizona, to the Los Angeles area with the intent to defraud the California Redemption Value program.

In March 2017, a successful multi-agency recycling fraud sting resulted in two arrests, the discovery of fraudulent documents, and the recovery of 14,695 pounds of used beverage containers from Arizona that had been allegedly imported for the purpose of defrauding the California Redemption Value Program.

Criminal Indictments

Grand Jury proceedings from December 4-7, 2017, resulted in the criminal indictments of five suspects on a total of 166 counts, including grand theft, recycling fraud, perjury, and conspiracy. RSA owner Shengchien Tseng, 49, of Cupertino; weighmaster Maximina Perez, 50, of San Leandro; assistant weighmaster Alejandra Lazaro Martinez, 26, of Hayward; assistant weighmaster Veronica Castillo, 35, of Sacramento; and assistant weighmaster Marlene Davalos-Mendez, 28, of Rocklin, were arrested and booked into the Sacramento County jail.

Product Stewardship (Extended Producer Responsibility) Enforcement

Program Description

Stewardship organizations representing product manufacturers are tasked with responsibly managing the end of life of their products. Carpet America Recovery Effort (CARE), Mattress Recycling Council (MRC), and PaintCare are responsible for submitting plans to CalRecycle for approval. After approving the plans, CalRecycle posts them on its website to allow stakeholders and the public to evaluate and comment on their progress. For each of the programs, individual manufacturers not represented by a stewardship organization must submit their own stewardship plans.

Stewardship plans define how a manufacturer or stewardship organization intends to fulfill its responsibilities for end-of-life product management under the law and communicate with stakeholders and the public. In 2010, AB 2398 (Perez, Chapter 681, Statutes of 2010) established the Carpet Stewardship Law and AB 1343 (Huffman, Chapter 420, Statutes of 2010) established the Paint Product Stewardship law. The Used Mattress Recovery and Recycling Act was enacted in 2013 (Hancock, SB 254, Chapter 388, Statutes of 2013).

To ensure a level playing field, the laws require all manufacturers who sell covered products in California (as well as all renovators, distributors, wholesalers, and retailers) to comply with the regulations. A list of compliant manufacturers and brands is generally compiled by the stewardship organizations and posted on CalRecycle's website for retailers to verify that the products being sold are compliant.

Consumers pay an assessment on carpet and paint when they buy a product covered by these laws, and they pay a recycling fee when they buy a mattress or box spring. Paint assessments are included in the purchase price. The carpet assessment and the mattress recycling fee are required to be clearly visible on the customer's receipt or invoice.

Assessments and recycling fees remitted to stewardship organizations provide funding for costs associated with end-of-life management or, in the case of carpet, for recycling processor incentive grants to increase recycling. The stewardship organizations also pay CalRecycle to cover administrative and enforcement costs associated with each of the product stewardship laws.

Compliance and Enforcement Activities

CalRecycle's compliance and enforcement role in the stewardship programs addresses both: 1) the stewardship organizations (by reviewing and approving plans and checking progress via annual reports), and 2) the industry (by posting compliant manufacturers and brands on our website and verifying compliance with program requirements). If

violations are identified, CalRecycle uses a progressive enforcement approach and establishes violation penalty ranges accordingly.

Enforcement Activity Data: Carpet

Inspections

CalRecycle inspects program participants (manufacturers, wholesalers, and retailers) to ensure compliance with program requirements.

- Manufacturers must be listed on CalRecycle's website in order to sell carpet in California. That listing ensures that manufacturers are registered under the approved product stewardship program or have their own approved plan. As of October, 2017, 75 carpet manufacturers were listed on CalRecycle's website as being registered with CARE to sell carpet in California.
- Wholesalers and retailers must monitor CalRecycle's website to ensure the carpet they sell is from compliant, registered manufacturers.
- The stewardship assessment fee must be clearly visible as a separate line item on the invoice and must be accompanied by a CalRecycle-approved label or description of the stewardship assessment.

If the manufacturer, wholesaler, or retailer is not in compliance, the inspector issues a notice of violation. The inspector works with the participant to identify the actions necessary to correct deficiencies. If the participant fails to achieve compliance after a follow-up review or inspection, the participant is subject to fines.

Manufacturer Inspections

During 2017, CalRecycle conducted a review of one carpet manufacturer (mill). The one mill reviewed was found to be in compliance.

Retailer and Wholesaler Inspections

Inspections are primarily conducted on a random basis. In 2017, CalRecycle staff inspected 24 carpet retailers and wholesalers. Of those inspected, 14 (58 percent) were compliant with program requirements. CalRecycle issued 10 notices of violation with the most common violation being non-compliant assessment labels on customer receipts. Full compliance efforts by the remaining 10 carpet retailers and wholesalers was not completed in 2017 and is on-going in 2018.

Enforcement Actions

In October 2017, CalRecycle issued one accusation, initiating enforcement against one carpet manufacturer (mill). Through this action, CalRecycle is seeking penalties and full

compliance with the law. Resolution to this action was not completed in 2017 and is ongoing.

Stewardship Organization Compliance Review

In March of 2017, CalRecycle filed an accusation against CARE regarding CARE's noncompliance with statutory requirements for the 2013-2015 reporting periods. A final enforcement action was pending at the end of 2017. However, on February 13, 2018, the State of California's Office of Administrative Hearings issued a ruling supporting CalRecycle's findings. On April 25, 2018, CalRecycle issued CARE a final decision and a penalty of \$821,250. CARE filed a writ on CalRecycle's final decision.

In addition, CARE's 2012-2016 California Carpet Stewardship Plan (CCSP) came to the end at the beginning of 2017. CARE developed and submitted a new 2017-2021 CCSP to CalRecycle. CalRecycle disapproved the submitted CCSP in April of 2017 and determined that the CCSP did not conform to the statutory requirements of PRC section 42970 et seq. In June 2017, CalRecycle adopted a Carpet Enforcement Plan, which allowed carpet manufacturers to continue operating under CARE's 2012-2016 CCSP through the end of the year under specific conditions. During this time, CalRecycle suspended routine inspections at California carpet retailers, resulting in a lower number of carpet retailer inspections in 2017.

Please visit this link to read more about the [Carpet Enforcement Plan item](#).

Enforcement Activity Data: Mattresses

Inspections

CalRecycle reviews program participants (manufacturers, recyclers, renovators, and wholesalers/retailers) to ensure compliance with program requirements if they are selling mattresses in California.

- Manufacturers and renovators are required to register with the MRC. As of the end of 2017, 260 manufacturers and 39 renovators had approved registrations with MRC. CalRecycle's website listed 546 brands and manufacturer identification numbers for these manufacturers and renovators.
- Retailers must ensure the mattresses they sell are on the most current CalRecycle website list of compliant/registered manufacturers, renovators, or appear on the brands list. Retailers are prohibited from selling mattresses from manufacturers or renovators that are not registered with MRC.
- The mattress recycling fee must be clearly visible as a separate line item on the customer's receipt or invoice. The retailer must collect the fee when a mattress or box spring is sold to a California consumer and then remit the fee to the MRC.
- Retailers must offer pick-up of old mattresses for no additional charge when delivering a new mattress to a California consumer.

If the manufacturer, recycler, renovator, or wholesaler/retailer is not in compliance, the inspector issues a Notice of Violation. The inspector works with the participant to identify the actions necessary to correct deficiencies. If the participant fails to achieve compliance after a follow-up review or inspection, the participant is subject to fines.

Manufacturer/Renovator Inspections

In 2017, CalRecycle inspected eight mattress manufacturers/renovators. Five were determined to be compliant. The remaining three manufacturers/renovators appear to be in violation. Further follow-up, including documentation requests, will be conducted to determine if the manufacturer/renovator is in violation. Results will be reported in a subsequent CalRecycle Enforcement Report.

Retailer Inspections

CalRecycle staff conducted 73 retailer inspections in 2017. Inspections focused on:

1. Educating retailers regarding compliance with the law;
2. Ensuring participants were following program requirements; and,
3. Following up on referrals of retailers suspected to be non-compliant.

Of the 73 retailers inspected, 40 retailers (55 percent) were in compliance and 33 retailers (45 percent) were initially determined to be in violation of program requirements. Of the 33 retailers in violation, 13 retailers came into compliance. In the end, 53 retailers (73 percent) were in compliance. The remaining 20 retailers (27 percent) continued to be in violation of the requirements and progressive enforcement actions continued into 2018.

Stewardship Organization Compliance Review

CalRecycle's director approved the state mattress recycling baseline and goals on December 5, 2017.

Please visit CalRecycle's website to read more about the [public notice](#) for consideration of proposed state mattress recycling baseline and goals.

Mattress Recyclers, Renovators, and Solid Waste Facilities Annual Reporting

The year 2017 was the first year CalRecycle received an annual report from mattress recyclers, renovators, and solid waste facilities. In accordance with the California Used Mattress Recovery and Recycling Act, mattress recyclers, renovators, and solid waste facilities, as defined by PRC Section 42991, must submit an annual report to CalRecycle by May 1, 2017, and each year thereafter. The annual reports include contact information and quantitative information for the previous calendar year (referred to as the measurement period).

In 2017, CalRecycle focused on identifying the reporting community which includes:

- 37 Renovators
- 11 Recyclers
- 360 Solid Waste Facilities

Through these efforts, CalRecycle provided education and outreach to support timely submittal of annual reports in future years. No enforcement actions related to this annual reporting requirement were taken in 2017.

Enforcement Activity Data: Paint

Inspections

CalRecycle reviews program participants (manufacturers and wholesalers/retailers) that are selling architectural paint in California to ensure compliance with program requirements.

- Manufacturers must be listed on CalRecycle's website to ensure they are covered/registered under the approved product stewardship program or have their own approved plan. At the end of 2017, approximately 235 manufacturers were registered. Also included in the listing are approximately 2,601 brands that are sold under private labels.
- Retailers, wholesalers, and distributors must monitor CalRecycle's website to ensure the paint they sell is on the most current CalRecycle list of compliant/registered manufacturers. They must also meet record-keeping requirements.

If the manufacturer, wholesaler, or retailer is not in compliance, the inspector issues a notice of violation. The inspector works with the participant to identify the actions necessary to correct deficiencies. If the participant fails to achieve compliance after a follow-up review or inspection, the participant is subject to fines.

Manufacturer Inspections

CalRecycle conducts file reviews of manufacturers to verify registration with PaintCare (the only approved paint stewardship program). CalRecycle initiates manufacturer reviews when unregistered products are identified during retailer inspections. CalRecycle determined six paint manufacturers were noncompliant in 2017. All six paint manufacturers corrected the violations following notification by CalRecycle.

Retailer Inspections

In 2017, CalRecycle staff conducted 100 in-store inspections to ensure that participants are following program requirements. Of those, 73 retailers (73 percent) complied with program requirements and 27 retailers (27 percent) were in violation of program requirements. CalRecycle is following up on these violations and the results will be reported in a subsequent CalRecycle Enforcement Report.

Stewardship Organization Compliance Review

On January 24, 2017, CalRecycle determined PaintCare's 2016 Annual Report to be compliant with statutory requirements.

List of Acronyms

Acronym	Full Name
AC	Administrative Complaint
CalRecycle	Department of Resources Recycling and Recovery
CAO	Clean-up & Abatement Order
CARE	Carpet America Recovery Effort, the stewardship organization for California's used carpet stewardship law
CDFA	California Department of Food and Agriculture
CHP	California Highway Patrol
CRV	California Redemption Value and California Refund Value <ul style="list-style-type: none"> • Redemption paid when the container is purchased. • Refund paid when the container is recycled.
DOJ	California Department of Justice
DTSC	California Department of Toxic Substances Control
EA	Enforcement Agency
EMSW	Engineered Municipal Solid Waste Facility
IMR	Imported Material Reports
LEA	Local Enforcement Agency—solid waste
NONC	Notice of Noncompliance
NOV	Notice of Violation
MRC	Mattress Recycling Council, the stewardship organization for California's used mattress stewardship law
PaintCare	The stewardship organization for California's used paint stewardship law
PRC	Public Resources Code — state statutes
RPPC	Rigid Plastic Packaging Container
SLP	Streamlined Penalty Letter
SWF	Solid Waste Facility

Acronym	Full Name
TEA	Tire Enforcement Agency

Appendix 1: Accessible Version of Figures

Figure 1: 2017 TEA and CalRecycle Waste Tire Enforcement Inspections

The figure shows TEA and CalRecycle Waste Tire Enforcement inspections conducted each year between 2013 and 2017.

Year	TEA	CalRecycle
2013	20,175	1,839
2014	18,603	1,863
2015	19,103	1,845
2016	15,445	2,279
2017	14,279	1,758

Figure 2: Enforcement actions and administrative complaints chart that summarizes NOVs, CAOs, and ACs issued by CalRecycle against permitted waste tire facilities

The figure shows the number of notice of violation, cleanup and abatement orders, and administrative complaints issued to permitted waste tire facilities between 2013 and 2017.

Year	Notices of Violation	Cleanup & Abatement Orders	Administrative Complaints
2013	9	2	2
2014	8	3	1
2015	12	2	1
2016	8	3	2
2017	11	3	1

Figure 3: Streamlined penalties by violation category and administrative complaints

This figure shows the amount of streamlined penalty cases served against waste tire haulers between 2013 and 2017.

Year	Hauler Registration	Manifest	Administrative Complaints	Combination: Hauler Registration and Manifest
2013	36	9	3	2
2014	36	13	5	0
2015	11	13	3	0
2016	9	24	5	0
2017	4	16	5	1

Figure 4: Solid waste facilities and operations: 2017

This figure shows the types of solid waste facilities, both active permitted facilities and authorized operations percentage in 2017.

Transfer and Processing	Compost	Disposal (Landfills and Inert Facilities)	Other: Transformation, eMSW and in-vessel
746	377	168	10

Figure 5: Solid waste facility inspections

This figure shows the number of inspections conducted by CalRecycle as an Enforcement Agency and the number of inspections conducted by the Local Enforcement Agencies between 2013 and 2017.

Year	LEA	CalRecycle
2013	12,864	549
2014	11,237	528
2015	12,213	560

Year	LEA	CalRecycle
2016	12,356	565
2017	12,782	740

Figure 6: CalRecycle oversight inspections

This figure shows the number of CalRecycle discretionary focused inspections, pre-permit focused inspection, and 18-month landfill periodic inspections between 2013 and 2017.

Year	Discretionary (Focused)	Pre-Permit (Focused)	18 Month – Landfills (Periodic)
2014	6	10	93
2015	31	15	110
2016	15	15	85
2017	42	24	60

Figure 7: Solid waste facility enforcement actions

This figure shows the number of notice of intent to list on the inventory, listed on the inventory, and enforcement actions for solid waste facilities between 2013 and 2017.

Year	Notice of Intent to List on Inventory	Listed on Inventory	Enforcement Actions
2013	29	4	10
2014	24	5	9
2015	35	1	16
2016	62	2	14
2017	60	5	16

Figure 8: LEA evaluation results by cycle

This figure shows the number of LEA evaluations pending, requiring a corrective action plan, fulfilling most LEA duties and responsibilities, or fulfilling all LEA duties and responsibilities each cycle between the third and seventh cycle.

Cycle	Pending	Requiring a corrective action plan	Fulfilling most of their duties or responsibilities	Fulling all LEA duties or responsibilities
3 rd Cycle	0	21	7	27
4 th Cycle	0	11	9	35
5 th Cycle	0	7	3	50
6 th Cycle	0	16	2	42
7 th Cycle – Partial	30	8	2	20

Figure 9: Local government diversion programs enforcement actions by year

This figure shows the year-end status of the Local Government Diversion Program compliance evaluations between 2013 and 2017.

Year	Evaluation Pending	Compliance Ongoing	Placed on Compliance	Compliance Fulfilled
2013	0	3	1	3
2014	5	1	0	0
2015	4	1	1	0
2016	1	2	1	0
2017	8	3	3	0

Figure 10: Rigid plastic packaging container

This figure shows the number of companies in each phase of the certification process from 2014 to 2017.

Year	Registration	Pre-Certification	Compliance Certification
2014	375	30	5
2015	275	56	16
2016	20	88	20
2017	30	54	35

Figure 11: Beverage container recycling infrastructure collection/processing

This figure shows the major players in California's Beverage Container Recycling infrastructure: certified recycling centers, processors/recyclers, curbside collection programs, collection/drop-off sites, and community service.

Recycling Centers (buyback)	Curbside	Collection or Drop-off Programs	Community Service Programs	Processors / Recyclers
59%	21%	7%	7%	6%

Figure 12: Recycling center probationary reviews: recycling centers

This figure shows the number of recycling centers recommended for revocation, those who voluntarily withdrew, passed probation, or probation was extended between 2013 and 2017.

Year	Recommended for Revocation	Voluntary Withdrawal	Passed Probation	Probation Extended	No Action Taken
2013	4	35	104	432	71
2014	5	30	383	611	63
2015	4	23	184	599	40
2016	1	21	140	552	63
2017	5	5	114	484	71

Figure 13: Compliance history/file review: actions taken

This figure shows the number of actions taken on recycling centers.

Year	Recommended for Revocation	Voluntary Withdrawal	Probation Extended or Review On-Going	No Action Taken	Passed Probation
2013	0	31	299	71	24
2014	2	24	460	63	316
2015	2	15	408	40	133
2016	0	19	396	63	73
2017	0	5	318	71	46

Figure 14: On-site reviews: actions taken

This figure shows the number of actions taken on recycling centers.

Year	Voluntary Withdrawal / Decertified	Probation Extended	Recommended for Revocation	Passed Probation
2013	4	133	4	80
2014	6	151	3	67
2015	8	191	2	51
2016	2	175	1	67
2017	0	166	5	68

Figure 15: Recycler center and dealer inspections

This figure shows the number of recycler center and dealer inspections conducted between 2013 and 2017.

Year	Recyclers	Dealers
2013	3,462	154
2014	4,691	255

Year	Recyclers	Dealers
2015	4,185	128
2016	3,430	510
2017	3,586	442

Figure 16: Recycling center inspections: enforcement actions

This figure shows the number of recycler center notice of non-compliance and notice of violations between 2013 and 2017.

Year	Recycling Center Non-Compliance (NONC)	Recycling Center Violations (NOV)
2013	1,050	303
2014	1,769	622
2015	1,053	611
2016	803	577
2017	726	617

Figure 17: Dealer inspections: enforcement action

This figure shows the number of dealer notice of non-compliance and notice of violations between 2013 and 2017.

Year	Non-compliance (NONC)	Violations (NOV)
2013	56	11
2014	82	31
2015	31	23
2016	202	68
2017	249	45