

**State of California
Department of Resources Recycling and Recovery**

**Public Hearing for the
Consideration of Action for Noncompliance for the
1-A District Agricultural Association (Cow Palace)**

April 15, 2014
10:00 am
Byron Sher Auditorium

I. ISSUE

For reporting year 2012, the Department of Resources Recycling and Recovery (Department) has identified 282 State agencies and large State facilities that are required to comply with the mandates of the State Agency Integrated Waste Management Plan Act Public Resources Code (PRC) Section 42920 et seq. Department staff has identified three (3) District Agricultural Associations (DAAs) as being noncompliant. One of the DAAs, the 1-A DAA (Cow Palace) is being presented in this item, while the two other noncompliant DAAs will be addressed separately.

Department staff is bringing forward its findings that Cow Palace is noncompliant for inadequately implementing diversion programs to achieve the 50 percent diversion requirement of PRC Section 42921 (b).

Cow Palace is a large State facility, of the California Department of Food and Agriculture's Division of Fairs and Expositions. Cow Palace, located in Daly City, opened in 1941. Cow Palace hosts a number of events including, but not limited to, music concerts, sporting events, circuses, and rodeos.

If the Department determines that Cow Palace is noncompliant, Cow Palace will be directed to develop a new/revised Plan of Correction. The new/revised Plan of Correction will identify a strategy for program enhancements and local actions necessary to enable Cow Palace to achieve the diversion requirements of PRC Section 42921 (b).

II. HISTORY

On November 17, 2010, the Department found Cow Palace to be noncompliant.

On November 23, 2010, the Department sent a letter to Cow Palace notifying them of the finding of noncompliance. The Department directed Cow Palace to prepare and submit a Plan of Correction by December 31, 2010.

On December 28, 2010, the Department received Cow Palace's Plan of Correction (Attachment 1).

III. DEPARTMENT OPTIONS

1. Find that the 1-A District Agricultural Association (Cow Palace) is not adequately implementing its diversion programs in accordance with the State Agency Integrated Waste Management Plan Act, and direct Cow Palace to submit a new Plan of Correction by May 30, 2014 and place Cow Palace on the noncompliance section of the Department's website.
2. Find Cow Palace is adequately implementing its diversion programs in accordance with the State Agency Integrated Waste Management Plan Act.
3. Direct Department staff to develop a letter to the Legislature and Governor reporting Cow Palace as noncompliant.
4. Direct the Local Assistance and Market Development Branch (LAMD) to be available to assist Cow Palace with compliance efforts.
5. Take no action at this time and provide Department staff with further direction.

IV. DEPARTMENT STAFF RECOMMENDATION

Department staff recommends approval of Options 1, 3, and 4: Find that the 1-A District Agricultural Association (Cow Palace) is not adequately implementing its diversion programs in accordance with the State Agency Integrated Waste Management Plan Act, and direct Cow Palace to submit a new Plan of Correction by May 30, 2014 and place Cow Palace on the noncompliance section of the Department's website, direct Department staff to develop a letter to the Legislature and Governor reporting Cow Palace as noncompliant, and direct LAMD to be available to assist Cow Palace with compliance efforts.

V. BACKGROUND

Legal Background

In accordance with PRC Section 42920, the Cow Palace submitted a State Agency Model Integrated Waste Management Plan for source reduction, recycling, and composting activities in May 2000. The State Agency Model Integrated Waste Management Plan's purpose was to commit Cow Palace to implement certain diversion programs in order to achieve 50 percent diversion. Furthermore, PRC Section 42921 (b) requires that each State agencies and large State facilities on and after January 1, 2004, divert at least 50 percent of all solid waste from landfill disposal.

Beginning January 1, 2009, the method of measuring the 50 percent diversion requirement of PRC Section 42921 was changed from using the diversion rate of each State agency and large State facility to using its per capita disposal rate (PRC Section 42921.5 (a)). The diversion rate is now determined by comparing each State agency and large State facility's actual per capita disposal rate for the evaluation period with its 50 percent per capita rate (target rate). The target rate and the reported per capita rate for the reporting period are used as factors in determining whether the Department needs to more closely examine the State

agency or large State facility's planned implementation efforts or require the expansion of existing or implementation of new programs (PRC Section 42921.5 (c)).

Statute also requires each State agency and large State facility to submit an annual report to the Department summarizing its progress in reducing solid waste, and meeting the diversion mandate of PRC Section 42921. The Department is required to use, but is not limited to the use of, this annual report in determining whether the agency's integrated waste management plan needs to be revised (PRC Section 42926).

Although PRC Sections 42921 (b) and 42926 outline the requirements, it does not provide clear direction as to the Legislature's intent should a State agency or large State facility not comply with the mandate. The PRC does not provide the Department with authority for specific enforcement action against a State agency or large State facility that is noncompliant or that has misreported to the Department. Therefore, the Department has instituted procedures designed to inform the Legislature and the public in the event a State agency or large State facility is noncompliant.

Summary of Past Compliance Reviews, Findings and Corrective Actions

The LAMD staff's 2008 review and analysis of Cow Palace's annual report determined that Cow Palace may have gaps in program implementation. Based on this determination, LAMD referred the facility to the Jurisdiction and Product Compliance Unit (JPCU) for an independent review.

JPCU staff independently reviewed Cow Palace's program implementation and diversion rates, using available information from Cow Palace's annual reports, waste hauler tonnage reports, Cow Palace employees, Department databases, and site visits. JPCU staff also considered and reviewed Cow Palace's calculated per capita disposal rate. Although, the calculated per capita disposal rate is not the final determinative factor of compliance, it is used as an indicator in evaluating program implementation and performance. Therefore, JPCU did and continues to include the per capita disposal rate as part of the assessment.

Based on the facilities compliance history and JPCU's independent review, the Department determined that Cow Palace was noncompliant on November 17, 2010, and caused the facility to develop a Plan of Correction (Attachment 1). The Plan of Correction, received by the Department on December 28, 2010, identified a strategy for program enhancements and local actions necessary to enable Cow Palace to achieve the diversion requirements of PRC Section 42921 (b).

VI. ANALYSIS

Compliance Review

Throughout the 2012 and 2013 review of Cow Palace, JPCU staff have:

- Maintained open communication

- Provided guidance and technical assistance
- Used Cow Palace documents to determine plan implementation efforts, including:
 - Reviewing the 2012 Annual Report submitted on May 1, 2013. A summary is presented in the Diversion Analysis Table (Attachment 2).
 - Reviewing the 2010 Plan of Correction. A summary is presented in the Diversion Analysis Table (Attachment 2).
- Conducted an evaluation of Cow Palace's diversion efforts through site visits on October 20, 2012, December 10, 2012, January 27, 2013, and December 12, 2013.
 - Prepared a Photo Report (Attachment 3) which contains visual documentation of site visit observations and supports JPCU staff analysis of the material flow analysis outlined below.
- Analyzed the material flow at the facility, which is described below.
- Completed a thorough review and have determined the current status of Cow Palace's program development and implementation efforts, which is described below.

Current Status of Program Development and Implementation

The Diversion Analysis Table (Attachment 2) provides a summary review of Cow Palace's diversion efforts. It compares program plans and implementation efforts through time by major diversion category. The table includes a summary of: the 2000 Cow Palace Integrated Waste Management Plan, the 2010 Observations and Findings, the 2010 Plan of Correction, 2012 Annual Report and the 2012 and 2013 Observations and Finding. The table documents Cow Palace's implementation efforts and continues to document areas of concern related to the cardboard program, the composting and organics program, the CRV beverage container program, the paper programs, and the education and outreach efforts.

Below is a summary of the current material flow at the State facility which demonstrates Cow Palace's implementation efforts.

Summary of Cow Palace's Materials Flow

Disposal Facilities

Cow Palace reports they self-haul some waste and use Allied Waste, Daly City's contracted services.

- Cow Palace operates their own packer truck. This self-hauled material is taken to Blue Line Transfer Station in South San Francisco.
- Allied Waste provides two 30-yard roll-offs. Allied reports they use the Ox Mountain Sanitary Landfill in Half Moon Bay.

JPCU staff contacted Allied Waste to inquire about the service they provide. At one time, the roll-offs were specifically for yard waste recycling and Cow Palace was charged a flat rate. However, there was so much contamination within the roll-offs that Allied Waste classified the contents as waste and is now charging by the ton. Cow Palace did

not implement their 2010 Plan of Correction to designate one of the roll-offs for recycling and one for disposal.

Recycling Rate Summary

Cow Palace provided diversion, disposal and employee data to the department in 2006, which resulted in its 50% equivalent target rate of 4.5 pounds per day per employee. The target rate does not account for the number of visitors to the facility. However, as outlined in the chart below, the tons disposed has increased while both the reported number of employees and visitors to the facility has decreased. This data is an indicator but is not the overriding reason for Cow Palace’s failure to comply with the statutory requirements.

Year	# of Visitors	# of Employees	Reported Disposed (Tons)	Calculated Per Capita Disposal Rate (Pounds/Employee/Day)	Cow Palace’s 50% Equivalent Per Capita Disposal Target (Pounds/Employee/Day)
2008	466,724	25	170.90	37.50	4.5
2009	482,000	25	127.60	28.00	4.5
2010	241,000	11	222.40	110.80	4.5
2011	289,000	11	246.70	122.89	4.5
2012	200,065	9	213.56	130.02	4.5

Recycling Facilities

Through staff’s analysis staff found that Cow Palace uses the following opportunities to divert/recycle materials. The use of these facilities may or may not be impacting the effectiveness of Cow Palace’s diversion programs.

- Self-hauled recyclables are taken to Recycle Central at Pier 39.
- Allied Waste provides seven 96-gallon toters for mixed recyclables, which are serviced weekly. The driver that services Cow Palace noted that Cow Palace usually only puts out three to four toters to be serviced and the toters are mostly empty. These recyclables are taken to Mussel Rock Transfer Station in Daly City.
- Manure/straw that is accumulated during the Grand National Rodeo is not consistently taken to the same facility. For example, one year it was picked-up by Recology and another year it was taken by a private hauler to a farm in Gilroy.

Cow Palace has informed JPCU staff that it does not have any conditions written into the rental agreements regarding recycling and diversion. Therefore, if a renter books an event at Cow Palace, they could refuse to use Cow Palace’s recycling services. Which means for some of the events held at Cow Palace, Cow Palace does not know whether or

not the renters are recycling. Also, some renters provide their own registration, which means Cow Palace does not have an accurate count of how many people attend events.

Communication and Notification History

On March 15, 2014, the Department mailed a 30-Day Notice letter to the Chief Executive Officer of the 1-A District Agricultural Association (Cow Palace), informing Cow Palace of the date, time, and location that the Department will hold a public hearing for the consideration of action for noncompliance with PRC Section 42920 et sec. (Attachment 4).

Findings

Department staff has determined that the 1-A District Agricultural Association's (Cow Palace) key diversion programs' effectiveness have not been maximized. These include the cardboard program, the composting and organics program, the CRV beverage container program, the paper programs, and the education and outreach efforts.

Department staff also reviewed Cow Palace's per capita disposal rate. Department staff used the per capita disposal as an indicator in evaluating program implementation and performance. The table below provides the reported efforts by Cow Palace.

Year	# of Visitors	# of Employees	Reported Disposed (Tons)	Calculated Per Capita Disposal Rate (Pounds/Employee/Day)	Cow Palace's 50% Equivalent Per Capita Disposal Target (Pounds/Employee/Day)
2008	466,724	25	170.90	37.50	4.5
2009	482,000	25	127.60	28.00	4.5
2010	241,000	11	222.40	110.80	4.5
2011	289,000	11	246.70	122.89	4.5
2012	200,065	9	213.56	130.02	4.5

Cow Palace has not demonstrated that it has adequately implemented its diversion programs, which prevents Cow Palace from achieving the 50 percent diversion requirement of Public Resources Code (PRC) Section 42921 (b).

VII. ATTACHMENTS

1. December 28, 2010 Cow Palace's Plan of Correction
2. Diversion Analysis Table
3. Photo Report – 1-A District Agricultural Association (Cow Palace)
4. March 14, 2014 30-Day Notice of Intent to Issue a Finding of Noncompliance

5. Request for Action for Consideration of the Issuance of Noncompliance to the 1-A District Agricultural Association (Cow Palace)

VIII. DEPARTMENT STAFF RESPONSIBLE FOR ITEM PREPARATION

Program Staff: Ashlee Yee

Phone: (916) 327-8824

Program Staff: Kathy Marsh

Phone: (916) 341-6475

Legal Staff: Tamar Dyson

Phone: (916) 341-6083

December 28, 2010

CalRecycle
Jurisdiction & Product Compliance Unit
1001 I Street
Sacramento, CA 95812

RE: Cow Palace Noncompliance with PRC Section 42921 – Plan of Correction

- All Staff must be trained and/or retrained regarding the recycling program in addition be trained on composting.
- Discussions with the Contracted food provider will take place with regards to implementing a recycling program in the food stands and food areas.
- Contracted food provider will be providing Leann Mazza with a sample of each product/container used in their food service area. Leann Mazza will provide all the samples to the recycling coordinator at Allied Waste for their review and follow up on recycling content.
- Program must be implemented for composting of food which will reduce cost of garbage. Once a program has been implemented training will need to take place with all staff of the Cow Palace.
- Possible alternative for contamination in the yellow debris boxes is to designate one box as recycle content, the other garbage, in order to avoid cross contamination.
- Office staff will need to be provided with training materials and containers for recycling additional products other than paper.
- Discussion with the CEO will need to take place regarding how to best address recycling provisions with the food contractor, any food sub-contractor and all interim rental contractors. In addition a provision may need to be done with all standard contracts as well.
- Better signage on the blue recycle bins as to acceptable items must be done. The public contaminates blue plastic, aluminum and glass bottle bins with paper dishes and cups.
- Additional bins if available for the food service items may need to be implemented.
- Staff must take a more pro-active stance on recycling during move-in, show-time, and move-out so that recycling is not seen as overwhelming.
- Signage should be placed around facility notifying the public and all temporary workers that the Cow Palace does have a recycling program. Each employee whether permanent or part-time must be involved with recycling, even if that means picking up a plastic bottle and walking a few extra steps to place in recycle bin.
- Report stated that the Cow Palace has a cardboard compactor, that needs to be corrected the Cow Palace does not own a compactor, currently the large Volvo garbage truck is emptied and cleaned and cardboard is compacted in garbage truck then taken to recycling facility.

- Consistent bagging and sorting of recyclables should take place after every event, not when there is enough volume, that way the staff will not find the recycling program so overwhelming, in addition may help with the gnats that tend to occur when bags are left untouched for months at a time.
- In the report it was stated from JPC that they observed two long piles of shavings and manure piled alongside the barns and not placed in a designated bin. The Cow Palace has pushed the shavings and straw outside until volume has been received and a call is placed with the hauler to pick up. Once the truck has arrived on site, Cow Palace loads the shavings and straw into their hauling trucks for removal. The Cow Palace will need to get information from hauler as to where the product is hauled too and the volume hauled from the facility.

Should you have additional questions or need additional information regarding the Plan of Correction please contact me at (415) 404 – 4117.

Sincerely

Leann M Mazza

2000 State Integrated Management Plan	December 14, 2010 Public Meeting Observations and Findings	Cow Palace's December 28, 2010 Plan of Correction (POC)	Cow Palace's 2012 Annual Report	2012 and 2013 Observations and Findings
	<p>designated collection bin. JPCU staff inquired what was to happen to the collected material. Cow Palace staff reported the facility has a contract with a hauler to remove the shavings; however they were unable to provide additional information regarding the contract and final disposition of the material.</p> <p>Cow Palace recognizes there is a great deal of food waste still being landfilled, and since there is no recycling in the kitchen, there is heavy food contamination in all kitchen trash. The kitchen trash contains paper, plastic, metal, food scraps, Styrofoam and cardboard. As reflected in the annual report, Cow Palace has indicated that a food waste diversion program would be beneficial, however to date it has not developed a program.</p>	<ul style="list-style-type: none"> Additional containers if available for the food service items may need to be implemented. <p>Also, the POC clarified that Cow Palace pushes the shavings and straw outside until volume is accumulated and a call is then made for a pick up. Once the truck has arrived on site, Cow Palace loads the shavings and straw. Cow Palace will need to get information from hauler as to where product is hauled to and the volume hauled from the facility.</p>	<p>implement this program due to cash flow and staffing.</p>	

Diversion Analysis Table

Program	Cow Palace's 2000 State Agency Model Integrated Waste Management Plan	December 14, 2010 Public Meeting Observations and Findings	Cow Palace's December 28, 2010 Plan of Correction (POC)	Cow Palace's 2012 Annual Report	2012 a Findin
<u>Cardboard</u>	Cow Palace reported that a cardboard program would be implemented in June 2000.	JPCU staff observed a centralized collection area. The area contained far less cardboard than expected. Significant cardboard disposal was found throughout the facility.	No mention of any cardboard program improvements. The POC clarified the facility's Volvo packer truck is emptied, cleaned, then cardboard is compacted and taken to recycling facility.	Cow Palace reported having a cardboard program.	JPCU's cardboard program is being a vendor and the the car behind vendor "trained" facilities. The vendor was asked to observe disposal. The ca
<u>Composting and Organics</u>	Cow Palace did not report having or proposing any type of composting program in regards to green waste or food. Cow Palace did report that there is a straw/manure program.	The 2008 and 2009 annual reports both indicate Cow Palace has a commercial pickup of compostables. JPCU staff observed at least two long piles of shavings and manure piled alongside the horse barn. The material was placed directly onto the pavement and not into a	Composting and organics programs were mentioned as an area Cow Palace could improve. Cow Palace outlined the following tasks: ● Implementing recycling and composting programs in the food stands and food areas.	Cow Palace did not report any organics recycling. Cow Palace recognizes the need for a food composting program which not only includes food scraps, but also food and liquid-soiled products. Cow Palace reported not being able to	Shavin in the s Cow P compo

2000 State 1 Integrated ement Plan	December 14, 2010 Public Meeting Observations and Findings	Cow Palace's December 28, 2010 Plan of Correction (POC)	Cow Palace's 2012 Annual Report	2012 and 2013 Observations and Findings
<p>ported that a container l be y June 2000.</p>	<p>JPCU staff estimated 80 percent of the waste containers were accompanied by a blue recycling container. However, cross-contamination was evident with large quantities of recyclables in waste containers throughout the facility.</p> <p>Cow Palace staff also reported that few recyclables were collected from the recycling containers that were throughout the facility.</p>	<p>The CRV beverage container program was mentioned as an area Cow Palace could improve. Cow Palace stated:</p> <ul style="list-style-type: none"> • Consistent bagging and sorting of recyclables should take place after every event, not when there is enough volume, that way the staff will not find the recycling program so overwhelming. <p>Additionally, this may help with the gnats that tend to occur when bags are left untouched for months at a time.</p>	<p>Cow Palace reported having a CRV beverage container program.</p>	<p>JPCU staff estimates that 50 percent of the waste containers are accompanied by a blue recycling container. JPCU staff inquired about the reduction of blue recycling containers since the 2010 visits. Cow Palace staff said the blue recycling containers have disappeared over time. Since 2010, JPCU staff has calculated a loss of approximately 37 percent of recycling containers.</p> <p>JPCU staff observed a significant increase in the amount of recyclables within the waste containers, especially the outdoor eating area where no recycling containers were. Cross-contamination continues to be an issue throughout the facility.</p> <p>In the POC, Cow Palace wanted to implement consistent sorting and bagging of recyclables, JPCU staff has not observed any changes to the sorting and bagging of recyclables.</p> <p>The CRV Beverage Container Program is not effective.</p>

Program	Cow Palace's 2000 State Agency Model Integrated Waste Management Plan	December 14, 2010 Public Meeting Observations and Findings	Cow Palace's December 28, 2010 Plan of Correction (POC)	Cow Palace's 2012 Annual Report	2012 Air Finding
<u>Glass</u>	Cow Palace reported that a glass program would be implemented by June 2000.	JPCU staff did not provide an analysis of the glass program. JPCU staff did note that Cow Palace had reported in the annual reports that there was a glass program.	No mention of any glass program improvements.	Cow Palace reported having a glass program.	JPCU's and lead reporting contain (Note: that glass count for
<u>Paper</u>	Cow Palace reported that paper programs would be implemented by June 2000. The paper programs included source reduction (use of double-sided copies), recycling of newspaper, and recycling of office paper.	JPCU staff did not provide an analysis of the paper programs. JPCU staff did note that Cow Palace had reported in the annual reports that there were paper programs.	No mention of any paper program improvements.	Cow Palace reported having the paper programs.	JPCU's recycling Palace's 96-gallon Cow Palace product event program dispose The paper but have effective

2000 State Integrated Management Plan	December 14, 2010 Public Meeting Observations and Findings	Cow Palace's December 28, 2010 Plan of Correction (POC)	Cow Palace's 2012 Annual Report	2012 and 2013 Observations and Findings
<p>outreach is not</p>	<p>JPCU staff reported that there are no visible public education programs.</p> <p>Cow Palace staff did inform JPCU staff that signage above and on containers was in place years ago, but has disappeared over time.</p>	<p>Education and outreach improvements include:</p> <ul style="list-style-type: none"> • All staff must be trained and/or retrained regarding the recycling program in addition be trained on composting. • Office staff will need to be provided with training materials and containers for recycling additional products other than paper. • Better signage on the blue recycle bins as to acceptable items must be done. The public contaminates blue plastic, aluminum and glass bottle bins with paper dishes and cups. • Staff must take a more pro-active stance on recycling during move-in, show-time, and move-out so that recycling is not seen as overwhelming. • Signage should be placed around the facility notifying 	<p>Cow Palace reported having signage, office recycling guides, and fact sheets, and employee training.</p>	<p>JPCU staff did not observe public education and outreach within Cow Palace.</p> <p>The lack of signage and outreach directly impacts diversion efforts. Cow Palace used the 2004 CRV beverage grant to purchase signs and posters, however Cow Palace is reporting the signage has disappeared over time.</p> <p>In the POC, Cow Palace wanted to implement better signage. JPCU staff did not observe any changes.</p> <p>In the POC, Cow Palace wanted to train and/or retrain all staff about the recycling program including composting. JPCU staff could not verify training was provided. JPCU staff observed Cow Palace staff disposing of source separated recyclables.</p> <p>The POC also states that office staff need to be trained and provided with containers for other materials besides paper. JPCU staff did not observe additional recycling of other materials besides paper.</p>

Program	Cow Palace's 2000 State Agency Model Integrated Waste Management Plan	December 14, 2010 Public Meeting Observations and Findings	Cow Palace's December 28, 2010 Plan of Correction (POC)	Cow Palace's 2012 Annual Report	2012 annual Finding
			<p>the public and all temporary workers that Cow Palace does have a recycling program. Each employee whether permanent or part-time must be involved with recycling, even if that means picking up a plastic bottle and walking a few extra steps to place in recycle bin.</p>		

Photo Report 1-A District Agricultural Association (Cow Palace)

A) Collection of Waste

Throughout the facility, JPCU staff found high valued recyclables in waste containers. Vendors broke down their own cardboard willingly and set it aside from the waste container. In many instances, this material was collected and disposed rather than recycled.



A) Collection of Waste (cont'd)

JPCU staff observed waste bins that were contaminated with multiple high-value recyclable materials, including cardboard boxes, CRV bottles and cans.



B) Collection of Recyclables

JPCU staff observed the centralized recyclable cardboard collection area. JPCU staff was told that usually the cardboard is stored inside. This collection is next to the main building.



JPCU staff observed this storage container where some of the recyclable cardboard and CRV bottles and cans were kept.

B) Collection of Recyclables (cont'd)

JPCU staff observed the collected recycled CRV containers. Compared to the event's attendance the material collected was not representative of the collection opportunities.



JPCU staff's observations of the recycling collection containers found significant contamination. This resulted in source separated CRV beverage containers being disposed.





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

March 15, 2014

Ken Alstott, Chief Executive Officer
1-A District Agricultural Association
2600 Geneva Avenue
Daly City, CA 94014

Subject: 30-Day Notice of Consideration of Action for Noncompliance with the Diversion Mandates of the State Agency Integrated Waste Management Plan Act (Public Resources Code (PRC) Section 42921)

Dear Mr. Alstott,

The purpose of this letter is to formally notify the 1-A District Agricultural Association (Cow Palace) that, due to its failure to implement its diversion programs, the Department of Resources Recycling and Recovery (Department) will conduct a public hearing for the Consideration of Action for Noncompliance with the Diversion Mandates of the State Agency Integrated Waste Management Act (PRC Section 42921). The public hearing will be held on April 15, 2014.

Department staff recommends that a representative of Cow Palace attend the Department hearing. At this hearing, the representative will have an opportunity to present any relevant information Cow Palace would like the Department to consider. The representative should also be prepared to answer any questions from the Department. The public hearing details are as follows:

Department of Resources Recycling and Recovery Monthly Public Hearing

Date: April 15, 2014
Time: 10:00 am
Location: Joe Serna Jr., Cal/EPA Building
Byron Sher Auditorium
1001 I Street, 2nd Floor
Sacramento, CA 95814

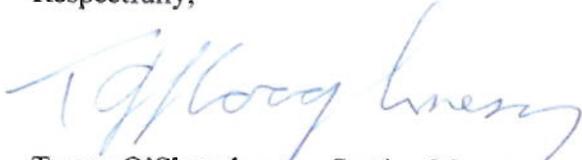
The full public hearing packet outlining the issuance will be available closer to the meeting date. It will be found on the Department's website at: calrecycle.ca.gov/PublicMeeting.

OVER



Should you have any questions about this letter or the upcoming hearing, please contact, Kathleen Marsh at (916) 341-6475 or Kathy.Marsh@calrecycle.ca.gov.

Respectfully,



Trevor O'Shaughnessy, Section Manager
Jurisdiction, Product, and Tire Compliance Section

cc: John Quiroz, Division of Fairs & Expositions
Leann Mazza, Recycling Coordinator, 1-A District Agricultural Association
Mark De Bie, Deputy Director, CalRecycle
Mitch Delmage, Manager, CalRecycle
John Muma, Supervisor, CalRecycle
Kathleen Marsh, Supervisor, CalRecycle
Rhonda Andrade, Staff, CalRecycle
Ashlee Yee, Staff, CalRecycle