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8 STATE OF CALIFORNIA

9 DEPARTMENT OF RESOURCES RECYCLING & RECOVERY

10 In the matter of:

11 R & L RECYCLE, INC.

12
13 RESPONDENT

14
15 TPID NO: 1787089

ACCUSATION FOR THE REVOCATION
OF WASTE TIRE HAULER
REGISTRATION AND ADMINISTRATIVE
COMPLAINT FOR WASTE TIRE
HAULER PENALTIES

PUBLIC RESOURCES CODE SECTION
42950, ET SEQ.

16
17 AGENCY NO: 2016-000016-REV
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20 INTRODUCTION

21 The California Integrated Waste Management Board (CIWMB) is now the
22 California Department of Resources Recycling and Recovery (CALRECYCLE).
23 CALRECYCLE succeeded to CIWMB's authority on January 1, 2010, pursuant to Public
24 Resources Code (PRC) section 40401(a)(1).

25 This Accusation for the Revocation of Waste Tire Hauler Registration and
26 Administrative Complaint For Waste Tire Hauler Penalties (hereafter, "Administrative
27 Complaint") is issued by CALRECYCLE to R & L Recycle, Inc., (RESPONDENT)
28 seeking revocation of RESPONDENT's waste tire hauler registration, and waste tire

1 hauler penalties in the amount of \$93,500.00. Pursuant to PRC sections 42960 and
2 42962, CALRECYCLE is authorized to issue a revocation of a waste tire hauler
3 registration and administratively impose penalties on a person to whom civil liability may
4 be levied. This Administrative Complaint is so issued based on the following facts.

5
6 **STATEMENT OF FACTS**

7 1. CALRECYCLE has authority to regulate and conduct enforcement actions
8 regarding Waste Tire Facilities and Waste and Used Tire Haulers within the State of
9 California under Public Resources Code (PRC) sections 42800 et seq., 42950 et seq.,
10 and attendant regulations contained in Title 14 of the California Code of Regulations
11 (CCR).

12 2. A "Used or Waste Tire Hauler" or "Hauler" is defined as, "any person
13 engaged in the transportation of used or waste tires, or tire casings, including haulers
14 that the Department [CALRECYCLE] approved as exempt from registration pursuant to
15 PRC section 42954." (Title 14 CCR section 18450(a)(37)).

16 3. A "Waste Tire Hauler Registration" is defined as, "the documents,
17 including the decal and registration form, issued by the Department [CALRECYCLE]
18 which authorizes the holder of the documents to legally haul waste or used tires within
19 California for the period of issuance." (14 CCR section 18450(a)(40)).

20 4. Pursuant to PRC section 42808(b), "Major waste facility" means a waste
21 tire facility where, at any time, 5,000 or more waste tires are or will be stored,
22 stockpiled, accumulated or discarded."

23 5. PRC section 42824 provides that "it is unlawful to direct or transport waste
24 tires to a major waste tire facility or to accept waste tires at a major waste tire facility
25 unless the operator has obtained a major waste tire facility permit."

26 6. Pursuant to PRC section 42951(b), "A registered waste and used tire
27 hauler shall only transport waste or used tires to a facility that is permitted, excluded,
28 exempted, or otherwise authorized by the board [CALRECYCLE], by statute, or by

1 regulation, to accept waste and used tires, or to a facility that lawfully accepts waste or
2 used tires for reuse or disposal.”

3 7. The “California Uniform Waste and Used Tire Manifest” is a form
4 developed by CALRECYCLE pursuant to PRC section 42961.5 and is also referred to
5 as the “Comprehensive Trip Log” or “CTL.” The CTL form is incorporated in the
6 regulations by 14 CCR section 18450(a)(11), and must be filled out completely and
7 accurately, including providing the Tire Program Identification (TPID) number for the
8 location of delivery or pick-up of each load of waste tires.

9 8. Pursuant to PRC section 42961.5(c)(2), “Any waste and used tire hauler
10 hauling waste or used tires for offsite handling, altering, storage, disposal, or any
11 combination thereof, shall complete the California Uniform Waste and Used Tire
12 Manifest as required by the board [CALRECYCLE]. The waste and used tire hauler
13 shall provide the manifest to the waste or used tire facility operator who receives the
14 waste or used tires for handling, altering, storage, disposal, or any combination thereof.
15 Each waste and used tire hauler shall submit to the board [CALRECYCLE], on a
16 quarterly schedule, a legible copy of each manifest. The copy submitted to the board
17 [CALRECYCLE] shall contain the signatures of the generator and the facility operator.”

18 9. Pursuant to PRC section 42960(b)(2), CALRECYCLE may suspend,
19 revoke, or deny a waste and used tire hauler registration for a period of three years to
20 five years, or may suspend, revoke, or deny a waste and used tire hauler registration
21 permanently, if the hauler was previously fined pursuant to Chapter 19 or Chapter 16 of
22 the PRC (commencing with section 42800).

23 10. Additionally, and alternatively, pursuant to PRC section 42960(a)(1),
24 CALRECYCLE may suspend, revoke, or deny a waste and used tire hauler registration
25 for a period of up to three years, if the applicant for, or holder of, the registration
26 commits more than three violations of, or fails to comply with any requirements of
27 Chapter 19 or Chapter 16 of the PRC (commencing with section 42800), or the
28 regulations adopted pursuant to those provisions, within a one-year period.

1 11. Title 14 CCR section 18451(a) requires waste tire haulers, retreaders,
2 waste tire generators, and end-use facilities to comply with these regulations.

3 12. RESPONDENT has been a waste tire hauler registered by CALRECYCLE
4 since May 30, 2014.

5 13. RESPONDENT was previously fined for violations of California Waste Tire
6 Laws and California Tire Hauler Registration Laws.

7 14. RESPONDENT was never issued a Waste Tire Facility Permit for its
8 waste tire facility at 1596 South 7th Street, Suite C, San Jose, California (site) by
9 CALRECYCLE and therefore is only authorized to store no more than 499 waste and
10 used tires on site at any time.

11
12 **TRANSPORTING WASTE AND USED TIRES TO AN UNAUTHORIZED LOCATION**

13 15. Between October 27, 2015 and November 11, 2015, RESPONDENT
14 transported at least 13 loads of waste and used tires to its waste tire facility at 1596
15 South 7th Street, Suite C, San Jose, California. This site is not, and has never been,
16 authorized by CALRECYCLE to store more than 499 waste and used tires.

17 RESPONDENT exceeded the amount of waste and used tires allowed at this site
18 creating an unpermitted major waste tire facility. The table below highlights the
19 violations by RESPONDENT:

20

CTL Form	Violation	Hauler	Load Date
5675196-C	Delivering waste tires to an unauthorized location	R & L Recycle	11/11/2015
5675186-C	Delivering waste tires to an unauthorized location	R & L Recycle	11/10/2015
5675186-B	Delivering waste tires to an unauthorized location	R & L Recycle	11/10/2015
5675187-C	Delivering waste tires to an unauthorized location	R & L Recycle	11/09/2015
5675148-B	Delivering waste tires to an unauthorized location	R & L Recycle	11/06/2015
5675148-C	Delivering waste tires to an unauthorized location	R & L Recycle	11/05/2015
5675161-B	Delivering waste tires to an unauthorized location	R & L Recycle	11/04/2015
5675162-B	Delivering waste tires to an unauthorized location	R & L Recycle	11/03/2015
5675178-B	Delivering waste tires to an unauthorized location	R & L Recycle	11/02/2015
5675187-A	Delivering waste tires to an unauthorized location	R & L Recycle	10/30/2015
5675173-A	Delivering waste tires to an unauthorized location	R & L Recycle	10/29/2015
5675145-C	Delivering waste tires to an unauthorized location	R & L Recycle	10/28/2015
5675181-C	Delivering waste tires to an unauthorized location	R & L Recycle	10/27/2015

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1 **SUBMITTING MANIFEST FORMS WITH ERRORS AND/OR OMISSIONS**

2 16. CALRECYCLE conducted three separate audits of RESPONDENT's
3 manifest forms submitted to CALRECYCLE between January 9, 2015 and September
4 23, 2015, September 24, 2015 and November 8, 2015, and November 9, 2015 and
5 January 4, 2016. CALRECYCLE additionally reviewed manifest forms on site during
6 each site inspection on September 23, 2015, November 9, 2015, and January 5, 2016.
7 CALRECYCLE determined through these audits that 109 manifest forms were
8 submitted to CALRECYCLE with errors and/or omissions, reflecting an approximate
9 error rate of 94 percent in violation of PRC section 42961.5(c)(2). The table below
10 highlights the violations by RESPONDENT:

11

Comprehensive Trip Log	Violation	Hauler	Load Date
5581666-C	Invalid or missing facility TPID	R & L Recycle	12/19/2015
5373927-C	Invalid or missing facility TPID	R & L Recycle	11/30/2015
5581652-A	Invalid or missing facility TPID	R & L Recycle	11/25/2015
5373922-C	Invalid or missing facility TPID	R & L Recycle	11/23/2015
5373917-A	Invalid or missing facility TPID	R & L Recycle	11/19/2015
5675138-C	Invalid or missing facility TPID	R & L Recycle	11/19/2015
5675200-C	Invalid or missing facility TPID	R & L Recycle	11/16/2015
5675143-A	Invalid or missing facility TPID	R & L Recycle	11/09/2015
5675144-A	Invalid or missing facility TPID	R & L Recycle	11/09/2015
5675146-C	Invalid or missing facility TPID	R & L Recycle	11/09/2015
5675141-A	Invalid or missing facility TPID	R & L Recycle	11/09/2015
5675141-C	Invalid or missing facility TPID		(Receipt A)
5675142-B	Invalid or missing facility TPID	R & L Recycle	11/06/2015
5675174-C	Invalid or missing facility TPID	R & L Recycle	10/29/2015
5675165-B	Loads not marked	R & L Recycle	10/28/2015
5675185-A	Invalid or missing facility TPID	R & L Recycle	10/26/2015
5675063-B	Invalid or missing facility TPID	R & L Recycle	10/23/2015
5675132-C	Invalid or missing facility TPID	R & L Recycle	10/23/2015
5675070	Invalid decal number	R & L Recycle	10/23/2015
5675154-A	Invalid or missing facility TPID	R & L Recycle	10/19/2015
5675106-C	Invalid or missing facility TPID	R & L Recycle	10/16/2015
5675133-B	Invalid or missing facility TPID	R & L Recycle	10/16/2015
5675123-B	Invalid or missing facility TPID	R & L Recycle	10/12/2015
5675108-B	Invalid or missing facility TPID	R & L Recycle	10/09/2015
5675091-B	Invalid or missing facility TPID	R & L Recycle	10/05/2015
5675091-C	Invalid or missing facility TPID		(Receipt B)
5675103	Invalid license plate number	R & L Recycle	10/05/2015
5675102	Invalid license plate number	R & L Recycle	10/02/2015
5675104	Invalid license plate number	R & L Recycle	10/02/2015

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5675100-C	Invalid or missing facility TPID	R & L Recycle	10/01/2015
5675098-A	Invalid or missing facility TPID	R & L Recycle	09/29/2015
5675090-C	Invalid or missing facility TPID	R & L Recycle	09/28/2015
5675087-C	Invalid or missing facility TPID	R & L Recycle	09/25/2015
5675073-B	Invalid or missing facility TPID	R & L Recycle	09/18/2015
5675074-C	Invalid or missing facility TPID	R & L Recycle	09/17/2015
5675054-C	Invalid or missing facility TPID	R & L Recycle	09/07/2015
5675024-C	Invalid or missing facility TPID	R & L Recycle	08/28/2015
5675017-B	Invalid or missing facility TPID	R & L Recycle	08/27/2015
5675021-C	Invalid or missing facility TPID	R & L Recycle	08/18/2015
5675001-B	Invalid or missing facility TPID	R & L Recycle	08/13/2015
5675006-A	Invalid or missing facility TPID	R & L Recycle	08/12/2015
5445211-C	Invalid or missing facility TPID	R & L Recycle	08/09/2015
5445204-B	Invalid or missing facility TPID	R & L Recycle	08/07/2015
5445263-B	Invalid or missing facility TPID	R & L Recycle	08/04/2015
5445215-A	Loads not marked	R & L Recycle	08/03/2015
5445223-B	Loads not marked	R & L Recycle	08/01/2015
5445219-B	Loads not marked	R & L Recycle	07/31/2015
5445238-C	Invalid or missing facility TPID	R & L Recycle	07/23/2015
5445256-A	Facility phone number missing	R & L Recycle	07/18/2015
5445245-C	Loads not marked	R & L Recycle	07/13/2015
5445277-C	Invalid or missing facility TPID	R & L Recycle	07/09/2015
5445279-B	Invalid or missing facility TPID	R & L Recycle	07/09/2015
5445275-A	Invalid or missing facility TPID	R & L Recycle	07/08/2015
5332167-A	Impossible load	R & L Recycle	07/08/2015
5445276-C	Invalid or missing facility TPID	R & L Recycle	07/07/2015
5445286-C	Closed facility	R & L Recycle	07/02/2015
5445408-A	Closed facility	R & L Recycle	06/22/2015
5445426-C	Invalid or missing facility TPID	R & L Recycle	06/19/2015
5445423-B	Invalid or missing facility TPID	R & L Recycle	06/17/2015
5445427-B	Invalid or missing facility TPID	R & L Recycle	06/15/2015
5445430-C	Invalid or missing facility TPID	R & L Recycle	06/15/2015
4995109	Invalid decal number	R & L Recycle	06/13/2015
5445433-A	Invalid or missing facility TPID	R & L Recycle	06/11/2015
5445437-C	Invalid or missing facility TPID	R & L Recycle	06/10/2015
5445441-B	Invalid or missing facility TPID	R & L Recycle	06/08/2015
5445455-B	Invalid or missing facility TPID	R & L Recycle	06/08/2015
5445454-C	Facility phone number missing	R & L Recycle	06/03/2015
5445464-C	Invalid or missing facility TPID	R & L Recycle	05/29/2015
5445476-A	Invalid or missing facility TPID	R & L Recycle	05/27/2015
5445496	Invalid decal number	R & L Recycle	05/27/2015
5445485	Invalid decal number	R & L Recycle	05/26/2015
5445497	Invalid decal number	R & L Recycle	05/26/2015
5445500-C	Invalid or missing facility TPID	R & L Recycle	05/21/2015
5445491-C	Invalid or missing facility TPID	R & L Recycle	05/20/2015
5391231-A	Invalid or missing facility TPID	R & L Recycle	05/15/2015
4995058	Invalid decal number	R & L Recycle	05/15/2015
4995032-C	Loads not marked	R & L Recycle	05/14/2015
4995029-A	Invalid or missing facility TPID	R & L Recycle	05/13/2015

1	4995022-C	Invalid or missing facility TPID	R & L Recycle	05/05/2015
2	4995016-C	Closed facility	R & L Recycle	04/30/2015
3	4995044	Invalid decal number	R & L Recycle	04/29/2015
4	4995047	Invalid decal number	R & L Recycle	04/29/2015
5	4995048	Invalid decal number	R & L Recycle	04/29/2015
6	4995052	Invalid decal number	R & L Recycle	04/29/2015
7	4995042	Invalid decal number	R & L Recycle	04/28/2015
8	4995041	Invalid decal number	R & L Recycle	04/27/2015
9	4995049	Invalid decal number	R & L Recycle	04/27/2015
10	4995050	Invalid decal number	R & L Recycle	04/27/2015
11	4995046	Invalid decal number	R & L Recycle	04/26/2015
12	4995051	Invalid decal number	R & L Recycle	04/25/2015
13	4995039	Invalid decal number	R & L Recycle	04/24/2015
14	4995040	Invalid decal number	R & L Recycle	04/24/2015
15	4995053	Invalid decal number	R & L Recycle	04/24/2015
16	4995059	Invalid decal number	R & L Recycle	04/24/2015
17	4995064	Invalid decal number	R & L Recycle	04/24/2015
18	4995038	Invalid decal number	R & L Recycle	04/23/2015
19	4995054	Invalid decal number	R & L Recycle	04/22/2015
20	4995065	Invalid decal number	R & L Recycle	04/21/2015
21	4995066	Invalid decal number	R & L Recycle	04/21/2015
22	4995055	Invalid decal number	R & L Recycle	04/20/2015
23	4995057	Invalid decal number	R & L Recycle	04/20/2015
24	4995068	Invalid decal number	R & L Recycle	04/20/2015
25	4995067	Invalid decal number	R & L Recycle	04/18/2015
26	4995056	Invalid decal number	R & L Recycle	04/17/2015
27	4995069	Invalid decal number	R & L Recycle	04/17/2015
28	4995072	Invalid decal number	R & L Recycle	04/17/2015
	4995070	Invalid decal number	R & L Recycle	04/16/2015
	4995073	Invalid decal number	R & L Recycle	04/16/2015
	4995090	Invalid decal number	R & L Recycle	04/16/2015
	4995091	Invalid decal number	R & L Recycle	04/16/2015
	5332167	Invalid decal number	R & L Recycle	01/09/2015

KNOWLEDGE OF HAULING AND MANIFESTING REQUIREMENTS

17. At the time of RESPONDENT's initial hauler registration and subsequently during the annual hauler registration renewal process, RESPONDENT was provided with instructions regarding the proper completion, retention, and delivery of CTL forms. At the time of RESPONDENT's initial registration and annually during the hauler registration renewal process, RESPONDENT received a hauler package containing the following: (1) instructions on transporting waste/used tires; (2) a complete list of hauler and manifesting regulations (Title 14, California Code of Regulations, Chapter 6); and

1 (3) a training compact disc on the proper storage and transportation of waste/used tires.
2 RESPONDENT was also sent a CTL Guidance Manual, explaining in detail how to
3 properly complete the CTL form, including the requirement to "manifest" (to document
4 on the CTL form) all waste and used tire pickups and deliveries, and a Hauler Alert
5 dated November 18, 2011, informing RESPONDENT of the zero tolerance policy
6 applicable to transporting waste tires to unauthorized locations.
7

8 **PRIOR FINES ISSUED BY CALRECYCLE**

9 18. On September 3, 2015, CALRECYCLE issued a Decision and Order for
10 penalties in the amount of \$300.00 against RESPONDENT for contracting with an
11 unregistered waste tire hauler (a violation of PRC section 42953) and failing to retain a
12 complete manifest form for the shipment of waste tires (a violation of PRC section
13 42961.5(b) and 14 CCR sections 18459.3 and 18462(b)).
14

15 **ALLEGATIONS OF SPECIFIC VIOLATIONS**

16 19. CALRECYCLE is seeking administrative penalties of \$93,500.00, pursuant
17 to PRC section 42962(c) based on the aforementioned facts and for the following
18 violations:

- 19 a. RESPONDENT knowingly violated PRC section 42951(b) by
20 transporting at least 13 loads of waste or used tires to an unauthorized
21 location.
22 b. RESPONDENT knowingly violated PRC section 42961.5(c)(2) by
23 submitting at least 109 manifest forms with errors and/or omissions to
24 CALRECYCLE between January 9, 2015 and January 5, 2016.
25

26 20. CALRECYCLE is additionally seeking revocation of RESPONDENT's
27 waste tire hauler registration for five years pursuant to PRC section 42960(b)(2), as
28 RESPONDENT has previously been fined for violations pursuant to Chapter 19 of the

1 PRC by contracting with an unregistered waste tire hauler and failing to retain a
2 complete manifest form for the shipment of waste tires.

3 21. Additionally and alternatively, CALRECYCLE is seeking revocation of
4 RESPONDENT's waste tire hauler registration for a period of up to three years pursuant
5 to PRC section 42960(a)(1), as RESPONDENT has committed more than three
6 violations of, and failed to comply with the requirements of Chapter 19 and Chapter 16
7 of the PRC within a one-year period, as shown by the aforementioned facts.

8 **PENALTIES**

9 22. CALRECYCLE's authority to assess administrative penalties against
10 RESPONDENT as a waste and used tire hauler is set forth in PRC section 42962(c)
11 and Title 14 CCR section 18463.

12 Pursuant to PRC section 42962(c):

13 In addition to the civil penalty that may be imposed pursuant to
14 subdivision (a), the board may impose civil penalties administratively
15 in an amount not to exceed five thousand dollars (\$5,000) for each
16 violation of a separate provision or for continuing violations for each
17 day that violation continues, on any person who intentionally or
negligently violates any permit, rule, regulation, standard, or
requirement issued or adopted pursuant to this chapter. . .

18 Title 14 CCR section 18463, provides in relevant part:

19 Any waste tire generator, end-use facility, or waste tire hauler, or any
20 party or person who commits any of the following acts shall be liable
21 for a civil penalty:

- 22 (a) Intentionally, or negligently violates any permit, rule, regulation, standard,
23 or requirement pursuant to Chapter 19 of the Public Resources Code
relating to the generation, transportation or disposal of used or waste tires.
- 24 (b) The aiding or abetting, or allowing of any violation, or noncompliance with
25 any permit, rule, regulation, standard, or requirement pursuant to Chapter
26 19 of the Public Resources Code relating to the generation, transportation
or disposal of used or waste tires...
- 27 (c) Any violation of, or noncompliance with any order issued by the
28 Department [CALRECYCLE] or by a hearing officer or a court relating to
the generation, transportation or disposal of used or waste tires.

1 (d) Any false statement, misrepresentation, or omission of a significant fact or
2 other required information in the application for a waste tire hauler
3 registration, Manifest Form, Unregistered Hauler & Comprehensive Trip
4 Log Substitution Form, or in information regarding these matters
5 subsequently reported to the Department [CALRECYCLE].

6 (e) In addition to liability for a civil penalty, the Department [CALRECYCLE]
7 may:

8 (1) File a claim against any registered waste tire hauler surety bond for
9 activities resulting from the illegal disposal of tires or injury.

10 (2) Deny, suspend, or revoke a waste tire hauler registration.

11 Furthermore, Title 14 CCR section 18464 allows CALRECYCLE to impose
12 administrative penalties in accordance with the penalty table therein.

13 23. Title 14 CCR section 18464 authorizes penalties for violations of 14 CCR
14 42951(b), including but not limited to: failure of tire haulers to transport waste or used
15 tires to a facility that is permitted, excluded, exempted, or otherwise authorized by the
16 department [CALRECYCLE], by statute or regulation, to accept used or waste tires, or
17 to a facility that lawfully accepts used or waste tires for reuse or disposal, with penalties
18 ranging from \$1,000-\$3,000 for each first offense.

19 24. RESPONDENT committed 13 violations of transporting waste tire to an
20 unauthorized location, totaling a \$39,000 penalty.

21 25. Title 14 CCR section 18464 authorizes penalties for violations of PRC
22 section 42961.5, including but not limited to: CTL, Manifest violations, or Electronic
23 reporting; including failure to submit the CTL, manifests, or electronic reporting on a
24 quarterly basis, missing information, incomplete information, and false information, with
25 penalties ranging from \$100-\$500 for each first offense.

26 26. RESPONDENT committed 109 manifesting violations, totaling a \$54,500
27 penalty.

28 27. As required by Title 14 CCR section 18465, in determining an appropriate
administrative penalty for RESPONDENT, CALRECYCLE has taken into consideration
the following factors:

- 1 (1) The nature, circumstances, extent, and gravity of the violation.
- 2 (2) Evidence that the violation was willful or negligent.
- 3 (3) The good or bad faith exhibited by the party.
- 4 (4) History of violation of the same or similar nature.
- 5 (5) The extent to which the party has cooperated with the Board
- 6 in remediating the violation.
- 7 (6) The extent that the party has mitigated or attempted to mitigate any
- 8 damage or injury caused by his or her violation.
- 9 (7) Evidence of any financial gain resulting from the violation.
- 10 (8) Such other matters as justice may require.
- 11

12 28. Accordingly, CALRECYCLE hereby requests that a waste tire hauler
13 administrative penalty be assessed against RESPONDENT in the sum of \$93,500.00,
14 and that RESPONDENT's waste and used tire hauler registration be revoked (or
15 suspended) for five years.

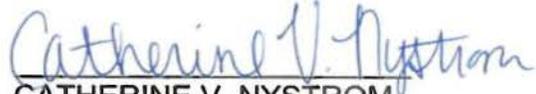
16 RIGHT TO HEARING

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18 You are hereby notified that pursuant to the provisions of PRC section 42961.1
19 and Government Code section 11505 that you are entitled to a hearing to refute the
20 allegations against you contained in this ACCUSATION FOR THE REVOCATION OF
21 WASTE TIRE HAULER REGISTRATION AND ADMINISTRATIVE COMPLAINT FOR
22 WASTE TIRE HAULER PENALTIES. **If you wish to have a hearing on this matter,**
23 **you must complete and return the enclosed REQUEST FOR HEARING/ NOTICE**
24 **OF DEFENSE to our Legal Office within 15 days of receipt of this Administrative**
25 **Complaint. Failure to complete and return the REQUEST FOR HEARING/NOTICE**
26 **OF DEFENSE within 15 days will be deemed a waiver of your right to a hearing.**

27 Pursuant to the above referenced Public Resources Code and Government Code
28 sections, discovery requests by any party must be made within 30 days after the service

1 of this ACCUSATION FOR THE REVOCATION OF WASTE TIRE HAULER
2 REGISTRATION AND ADMINISTRATIVE COMPLAINT FOR WASTE TIRE HAULER
3 PENALTIES.

4
5 Dated this 19 day of April, 2016.

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8 CATHERINE V. NYSTROM
9 Attorney for
10 Department of Resources Recycling and
11 Recovery (CALRECYCLE)
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