CVSan

October 11, 2011

California Environmental Protection Agency
Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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President Pro Tem

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Roland P. Williams, Jr.
General Manager

Subject: COMMENTS: AB32 - PROPOSED MANDATORY COMMERCIAL RECYCLING REGULATIONS

Dear Air Resources Board:

Upon reviewing the draft regulations and participating in workshops via conference call to address stakeholder questions for the proposed mandatory commercial recycling regulation, Castro Valley Sanitary District (CVSan) would like to submit the following questions during the Q & A period. Please see below for more details:

1) The proposed regulation states that "*the definition of business includes strip malls containing two or more commercial entities.*" Does this mean that just the complex strip mall that a business resides in is required to recycle at a minimum level, even if many businesses within that complex share recycling services?

2) Is there an exact minimum amount of recycling that is required of a business or complex with shared services? For example, as stated above, if a complex just needs to recycle, would the smallest recycling container offered by a jurisdiction be adequate for the entire complex?

3) The regulation states that self-hauling recyclables would be enough for a business to be considered recycling. Does self-hauling include taking recyclables from a business to an employee or owner's residence to recycle?

4) What is the estimated cost of implementation per business and per multi-family complex/unit?

Thank you for the consideration of our questions and comments. We look forward to continuing our work with CalRecycle and the Air Resources Board on this and other matters and programs. Should you have questions, please contact me at naomi@cvsan.org or (510) 537-0757.

Yours truly,

Naomi R. Lue
Solid Waste Supervisor

cc: R. Williams, M. Jeffery, J. Figueiredo
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