



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Western Region Salem Office

4026 Fairview Industrial Dr SE

Salem, OR 97302

(503) 378-8240

FAX (503) 373-7944

TTY 711

February 12, 2018

### TRANSMITTED VIA ELECTRONIC MAIL

Mr. Clay Warner, Recycling Service Manager  
Garten Services Inc.  
3334 Industrial Way NE  
Salem, OR 97301

RE: Conditional Material Handling Concurrence

Dear Clay,

As you are aware, China prohibited the import of certain mixed paper and plastic grades beginning on Jan. 1, 2018. Additionally, China has announced a new and exceedingly stringent recyclable contamination standard of 0.5 percent. China is the main market for Oregon's recyclable mixed paper and plastic. This has created a condition where the primary market for much of Oregon's recyclable materials is severely constrained and in jeopardy of disappearing.

In an effort to meet the tightened contamination standards, recycling processing facilities have slowed their sorting lines. This has resulted in a slower throughput of materials. The flow of materials from Oregonians sent for recycling has not slowed to match this constraint. Without an outlet for the collected materials, sorting and storage capacity have become constrained. In some cases, processing and storage capacity have already been exceeded and recycling costs exceed disposal costs.

DEQ, working closely with representatives from the recycling industry and local governments has initiated a short-term stopgap solution to help alleviate the flow of materials throughout the collection and processing system. When all options to find markets for recyclable commodities have been exhausted, DEQ concurs that landfilling these materials on a temporary basis is an unfortunate but needed option at this time.

This concurrence is subject to the conditions set forth below:

**Effective date:** February 12, 2018.

**Duration:** May 1, 2018 expiration date. Adjustments may be made if conditions change.

### **Required conditions**

The following required conditions must be met prior to disposal of the materials identified below. DEQ may in the future also verify that the conditions continue to be met.

- 1.1. Prior to disposal, good faith efforts were made to find recycling processors or end markets for the materials. (Documentation that at least three processors or end markets were solicited should be available upon DEQ request); and
- 1.2. The material disposed of can no longer be collected (including consideration of storage, processing and safety constraints) and sold at a net cost equal to or less than the cost of collection and disposal. (Financial documentation demonstrating this should be available

upon DEQ request). Where no feasible market exists, costs for recycling are assumed to exceed the costs for disposal; and

1.3. Impacted local governments have been informed and required approval obtained.

### **Notification Summary**

The following information has been provided to DEQ:

1.4. Material type(s)

- #3-7 Plastic
- Rigid Plastic
- Mixed Waste Paper

1.5. Estimated amount(s) of material to be disposed per month

- #3-7 Plastic 25 tons/month
- Rigid Plastic 14 tons/month
- Mixed Waste Paper, 800 tons to start, then 300 tons/month

1.6. Estimated amount of recyclable material sent to market or a processing facility for recycling

- 0 tons/month for materials listed above

1.7. Source(s)

- Residential and commercial curbside commingle

1.8. Geographic area of material origin

- Salem, Dallas, Eugene, Monmouth, Independence, Keizer, Waldport, and Newport

1.9. Proposed start date

- February 12, 2018

1.10 Proposed disposal site

- Coffin Butte Landfill or Covanta Waste to Energy Facility

### **Reporting Requirements**

The following information shall be completed by an authorized representative and submitted to DEQ by the 15<sup>th</sup> of the following month until the end date or expiration date. A web link to date submittal will be provided.

2.1. Actual material types disposed

2.2. Actual amounts of materials disposed

2.3. Actual sources of materials – Commercial, Residential or Depot

2.4. Actual geographic area of material origin (City, County, etc)

2.5. Actual disposal date(s)

2.6. Actual disposal location(s)

2.7. Actual amounts of recyclable material sent to market or a processing facility for recycling

2.8. What efforts have you made to determine if recycling of this material can resume?

Provided all the information submitted above is correct, DEQ concurs that landfilling of this material on a temporary basis is an unfortunate but necessary option. Please let DEQ know if any of the above information changes. DEQ will provide a web link to you for you to submit your monthly report to us. We will notify you when it is available.

If you have any questions, please contact Cathie Rhoades at 503-378-5089 or [rhoades.cathie@deq.state.or.us](mailto:rhoades.cathie@deq.state.or.us).

Sincerely,



Brian Fuller  
Manager Western Region  
Materials Management and Hazardous Waste Programs

BRF/cdr

ec: Brian May, Marion County Environmental Services, Wasteshed Representative:  
[BMay@co.marion.or.us](mailto:BMay@co.marion.or.us)  
Jim Solvedt, Polk County Community Development, Wasteshed Representative:  
[solvedt.jim@co.polk.or.us](mailto:solvedt.jim@co.polk.or.us)  
Mark Saelens, Lincoln County Solid Waste District, Wasteshed Representative:  
[msaelens@co.lincoln.or.us](mailto:msaelens@co.lincoln.or.us)  
Sarah Grimm, Lane County Waste Management, Wasteshed Representative:  
[Sarah.GRIMM@co.lane.or.us](mailto:Sarah.GRIMM@co.lane.or.us)  
Steve Powers, City Manager, Salem OR: [manager@cityofsalem.net](mailto:manager@cityofsalem.net)  
Chris Eppley, City Manager, Keizer OR: [eppleyc@keizer.org](mailto:eppleyc@keizer.org)  
Greg Ellis, City Manager, Dallas OR: [greg.ellis@dallasor.gov](mailto:greg.ellis@dallasor.gov)  
David Clyne, City Manager, Independence OR: [clyne.david@ci.independence.or.us](mailto:clyne.david@ci.independence.or.us)  
Scott McClure, City Manager, Monmouth OR: [smcclure@ci.monmouth.or.us](mailto:smcclure@ci.monmouth.or.us)  
Spencer Nebel, City Manager, Newport OR: [s.nebel@newportoregon.gov](mailto:s.nebel@newportoregon.gov)  
Kerry Kemp, City Manager, Waldport OR: [kerry.kemp@waldport.org](mailto:kerry.kemp@waldport.org)  
David Lear, Mid-Valley Garbage & Recycling Association: [david@mrrf.net](mailto:david@mrrf.net)  
Casey Holiday, Brandt's Sanitary Service: [casey@brandtssanitary.com](mailto:casey@brandtssanitary.com)  
Rachel Snyder, Republic Services: [RSnyder2@republicservices.com](mailto:RSnyder2@republicservices.com)  
Rob Thompson, Thompsons Sanitary Services: [rob@thompsonsanitary.com](mailto:rob@thompsonsanitary.com)  
Zack Dahl, Dahl & Dahl Inc.: [z.dahl@dahl Disposalservice.com](mailto:z.dahl@dahl Disposalservice.com)  
Aaron Donley, EcoSort LLC: [aarond@wasteconnections.com](mailto:aarond@wasteconnections.com)  
Cathie Rhoades, MMTA, DEQ – Salem  
Ms. Denise Miller, WR Solid Waste Permit Coordinator, DEQ – Eugene