



Oregon

Kate Brown, Governor

Department of Environmental

Eastern Region Bend Office
475 NE Bellevue Drive, Suite 110
Bend, OR 97701
(541) 388-6146
FAX (541) 388-8283
TTY 711

October 28, 2016

Scott Briggs,
ORRCO
4150 N Suttle Road
Portland, OR 97217

Re: ORRCO October 19, 2016 letter

Dear Mr. Briggs:

Thank you for your letter dated October 19, 2016, asking DEQ to allow ORRCO to use the kiln at either the Portland or the Klamath Falls facility to burn off filters to make them acceptable for acceptance at Metro Metals as scrap metal. ORRCO cannot restart the kilns before being issued a DEQ solid waste permit and without review by DEQ's Air Quality staff for emission assessment and compliance with Oregon's air quality incinerator rules.

ORRCO is proposing to install an oil filter baler Oberg SB-300 unit that will cube oil filters and ORRCO has asked to use the kiln to burn off remaining oil, paper, rubber, and other debris from the filters to obtain clean scrap metal to send to metal recyclers. DEQ reviewed the letter and email from ORRCO that included a video showing an oily filter cube exiting the Oberg filter cuber. As we discussed in our October 24, 2016 telephone conversation, you informed DEQ that ORRCO has had difficulty marketing the cubed filters as scrap metal due to the presence of oil remaining in the filters after cubing. DEQ is aware of three oil processing facilities that either have or will be using a filter baler/cuber: American Petroleum Services, Thermofluids, and ORRCO. American Petroleum Environmental Services uses an Oberg SB-300 filter baler and has been selling scrap metal to Metro Metals. Thermofluids is currently installing a baler and discontinuing the use of its thermal processing equipment.

DEQ reviewed federal rules and EPA guidance regarding crushed filters and agrees that under federal RCRA rules, the filters are processed scrap metal and not solid waste or hazardous waste. Under Oregon law the filters are solid waste and would require a DEQ solid waste permit before they could be processed in the kilns. The use of the kiln or Pyro unit would also need to be reviewed by DEQ's Air Quality staff for emission assessment and compliance with Oregon's air quality incinerator rules that include federal Commercial Industrial Solid Waste Incinerator regulations.

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DEQ encourages recycling both the scrap metal and the used oil in the filters, and recommends that ORRCO review its cubing process to evaluate eliminating oil drippage without thermal treatment. DEQ also recommends that ORRCO contact other scrap metal handlers to determine if they will accept the cubed filters.

If you have questions, please feel free to contact me in writing or by phone at 503-229-5072 or email: obrien.audrey@deq.state.or.us. You may also contact Laurey Cook at 503-229-5015 or email: cook.laurey@deq.state.or.us.

Sincerely,



Audrey O'Brien

Manager, NWR Environmental Partnerships

Cc: Heather Kuoppamaki
Louis Bivens
Laurey Cook
Brian Allen
Frank Messina
Jeff Bachman
Mark Bailey
Michael Orman
Gary Vrooman, DOJ
Nina DeConcini
Linda Hayes-Gorman