



Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

Western Region Salem Office

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October 17, 2011

David Lynch
SierraPine Ltd, Medford Division
P.O. Box 4040
Medford, OR 97501

RE: Beneficial Use Determination 20101012 SierraPine
Ltd, Wet Scrubber Mud - Jackson County

Dear Mr. Lynch:

The Department of Environmental Quality has reviewed SierraPine's October 12, 2010 application for a solid waste beneficial use determination. The application proposes to produce SierraPine wet scrubber mud material as a saw dust and wood chip substitute for use as: 1) agricultural and nursery soil amendment/ mulch, 2) livestock bedding and 3) as feedstock for composting facilities.

DEQ has determined that SierraPine's proposal to beneficially use wet scrubber mud as: 1) agricultural and nursery soil amendment/ mulch and 2) livestock bedding meets the requirements for a case-specific Beneficial Use Determination under Oregon Administrative Rules 340-093-0260 through -0290. The BUD is limited to the materials, approved uses, and conditions specified in the table below. The conditions of the BUD are intended to prevent adverse effects to human health and the environment.

Solid Waste	Beneficial Use	Conditions on Use
SierraPine Ltd Wet Scrubber Mud	Livestock bedding, agricultural and nursery mulch/ soil amendment	<ul style="list-style-type: none"> - Users must be provided with a written description of the composition of the wet scrubber mud and a chemical analysis; - Users must be provided with written guidance on appropriate management of scrubber mud including methods on how to prevent nuisance dust and specific appropriate agricultural use as mulch or soil amendment; - SierraPine must track the amounts and disposition of wet scrubber mud including name, address, and phone number of users. The list must be kept for 10 years and made available to DEQ upon request.

DEQ's determination is based on a review of whether SierraPine's proposed beneficial uses of wet scrubber mud meet the case-specific beneficial use performance criteria outlined in OAR 340-093-0290. Details of our review are provided in the attached case-specific evaluation report.

Regarding the use of wet scrubber mud as feedstock for composting facilities, DEQ has determined a Beneficial Use Determination is not necessary as the scrubber mud meets the Type 1 compost feedstock definition. The scrubber mud can be utilized as a feedstock at DEQ permitted composting sites.

If you have any questions about this BUD, please contact Bob Bairows at 541-687-7354 or Bill Mason at 541-687-7427.

Sincerely,

Brian Fuller, Manager,
Western Region Hazardous and Solid Waste Program

Enc
cc: File, Bill Mason, DEQ-Eugene

SierraPine Assignment Terminated,
BUD still valid and transferred to Roseburg Forest Products