

Department of Environmental Quality Northwest Region

700 NE Multnomah St, Suite 600 Portland, OR 97232 (503) 229-5263 FAX (503) 229-6945 TTY 711

October 15, 2015

Andrew D. Swartwout United States Gypsum Company PO Box 37 Rainier, OR 97048

RE: Beneficial Use Determination (BUD-20150831), United States Gypsum Company Shredded Scrap Wallboard, Columbia County

Dear Mr. Swartwout:

The Department of Environmental Quality (DEQ) has reviewed the August 31, 2015 United States Gypsum Company (USG) application for a solid waste beneficial use determination for shredded scrap wallboard generated at the Rainier Wallboard Plant. Wallboard scrap is a byproduct of wallboard manufacturing and recycling. USG estimates approximately 6,000 tons of shredded scrap wallboard is generated each year.

The application proposes to use the shredded scrap wallboard as animal bedding for livestock followed by land application as a soil amendment. USG proposes to initially provide the material to farms in the Portland Basin or Coastal region. USG believes there are multiple locations throughout Oregon that would benefit from the paper/gypsum product as an animal bedding and soil amendment product.

DEQ has determined that the beneficial use proposal meets the requirements for a case-specific Beneficial Use Determination (BUD) under Oregon Administrative Rule (OAR) 340-093-0260 through 340-093-0290. This BUD is issued to USG and 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.

Table 1

Material	Beneficial Use	Conditions on all Uses
, <u>1</u>	Animal bedding for livestock followed by land application as a soil amendment on farm lands.	1. US Gypsum must submit name and addresses of all farms that will accept the shredded wallboard to DEQ for approval prior to beneficially using the shredded wallboard at that location for animal bedding as well as for soil amendments. Please submit information to Heather Kuoppamaki at kuoppamaki.heather@deq.state.or.us

Table 1

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	2. US Gypsum must characterize the wallboard scrap by testing the material periodically to determine that contaminant concentrations have not changed. US Gypsum must test the materials at least annually or whenever the material comes from a new manufacturer or the specifications change. Submit results to DEQ for verification that the wallboard materials have not significantly changed from the characteristics of the BUD application.
	3. The use must conform to any Oregon Department of Agriculture requirements and must be applied as a soil amendment at ODA approved agronomic rates
	4. The shredded scrap wallpaper and spent animal bedding may not be placed where it will be in contact with or adversely impact groundwater or surface water.
	5. Material use must comply with all applicable federal, state, and local regulations.
	6. Records of all uses identifying the user, quantity, location, purpose of use, and analytical results must be kept for a period of five years and submitted to DEQ for review annually by January 31 (for the preceding year).
	7. All conditions of use must be provided in writing to end users of the material and owners of the property upon which the material is applied.

DEQ's determination is based on a review of USG's application for beneficial use of shredded wallboard to be produced at their Rainier, Oregon Wallboard Plant, demonstrating the case-specific beneficial use performance criteria outlined in OAR 340-093-0290 are met for the approved uses. Details of DEQ's review are provided in the attached case-specific evaluation report.

If the characteristics of the wallboard material change, US Gypsum must inform DEQ and obtain concurrence that the material meets the BUD criteria.

No other uses are approved. If US Gypsum identifies additional uses for the wallboard waste materials, US Gypsum must submit a new BUD application for the proposed use for DEQ approval.

Per OAR 340-093-0290(9), DEQ may modify or revoke this case-specific BUD at any time based on new information showing the potential to cause adverse impact to public health, safety, welfare, or the environment.

If you have any questions or concerns please contact Heather Kuoppamaki (DEQ project manager) by phone at (503) 2295 or email at kuoppamaki.heather@deq.state.or.us. DEQ appreciates your cooperation in protecting Oregon's environment.

Sincerely,

Audrey O'Brien, Manager Northwest Region Environmental Partnerships

Enclosure: Beneficial Use of Solid Waste Determination Evaluation Report

Cc: Heather Kuoppamaki, DEQ NWR, <u>kuoppamaki.heather@deq.state.or.us</u> <u>mailto:</u> Bill Mason, DEQ-WR-Eugene, <u>mason.bill@deq.state.or.us</u>