



# Oregon

Kate Brown, Governor

## Department of Environmental Quality

Western Region Medford Office

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TTY 711

Feb. 21, 2018

Dan Beck  
EHS Regional Manager  
Plycem USA, LLC  
1200 Avenue G  
White City, OR 97503

RE: Transferring ownership and modifying material formulation for BUD-20130723: Beneficial Use Determination issued to CertainTeed for Off-Spec Fiber Cement siding and tile backer generated by the White City facility;  
**New owner: Plycem USA, LLC**

Dear Mr. Beck:

Thank you for the letter dated Dec. 28, 2017 notifying DEQ of the change of ownership from CertainTeed Corporation to Plycem USA, LLC, requesting a transfer of the existing Beneficial Use Determination for Off-Spec Fiber Cement siding and tile backer generated by the facility, and the change in formulation of your product. The letter indicates under Plycem ownership the material formulation has been slightly modified. The modification is eliminating fly ash (2 – 6 percent) which is now replaced by alumina (2 – 6 percent). Beneficial uses will remain the same.

After review of the formulation modification, DEQ has determined that the modification does not increase the risk to public health or the environment. DEQ is maintaining the approval for BUD-20130723 originally issued to CertainTeed Corporation for off-Spec fiber cement siding and tile backer generated by the White City facility. The BUD allows the use of both formulations until such time as material generated using the original formulation is exhausted. The BUD will remain in effect as long as the waste material composition remains the same and all conditions described in the original application and prescribed in the BUD remain the same. DEQ will not regulate Plycem's off-spec fiber cement siding and tile backer waste as a solid waste as long as the waste is used in accordance with the beneficial use determination.

DEQ reviewed the original application and determined the proposal to beneficially use off-spec fiber cement siding and tile backer waste as: Non-residential construction fill, utility trench fill or road base; or feedstock substitute for concrete production. The waste material 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 described in the original application and the Plycem letter dated Dec. 28, 2017, and the approved uses and conditions specified in the table below. The conditions of the BUD are intended to prevent adverse affects to human health and the environment.

Solid Waste	Case-Specific Beneficial Use	Conditions of Use
<p>Unused Plycem concrete siding and tile backer waste – may be unprimed/primed/painted</p>	<p>Non-residential construction fill, utility trench fill or road base; or feedstock substitute for concrete production</p>	<ol style="list-style-type: none"> <li>1. The concrete siding and/or tile backer must not contain concentrations of hazardous substances above DEQ approved human health occupational risk-based screening levels or naturally occurring background, whichever is higher. Materials with Acrylic latex paint/primer coatings are authorized for beneficial use; materials with other coatings will require an independent evaluation prior to beneficial use.</li> <li>2. The concrete siding and/or tile backer may be used only for non-residential construction fill, utility trench fill or road base that will not come into contact with or adversely impact groundwater or surface water.</li> <li>3. The concrete siding and/or tile backer must not be stored or used in drainage applications or near water or wetland areas and must not be stored or used in ways that would allow discharge to groundwater, surface water, or wetland areas.</li> <li>4. After being beneficially used, the concrete siding and/or tile backer must be covered by asphalt, concrete, clean fill or equivalently covered to minimize exposure to human and ecological receptors; such as cover with three inches of asphalt or concrete or six inches of clean soil, rock, sand or similar materials.</li> <li>5. Plycem must notify prospective users of the conditions of use and provide a copy of this BUD approval.</li> <li>6. In accordance with OAR 340-093-0280(3)(b), until the time the material is used under the BUD conditions specified, Plycem and any person that receives the concrete siding and/or tile backer must store and manage the material to prevent releases to the environment and nuisance conditions.</li> <li>7. Feb. 1 of every year, Plycem must submit a report to DEQ identifying the locations used, volume transferred, to whom and for what purpose (as stated by the purchaser). Per OAR 340-097-0120(2)(f), Plycem must include the \$250 reviewing fee with the annual report.</li> </ol>

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		<p>8. Plycem must keep records of all transfers containing the information in #7 above for five years.</p> <p>9. If manufacturing processes, chemical characteristics, physical characteristics and/or end uses are modified, Plycem must first have the material re-evaluated prior to beneficial use.</p>
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DEQ's determination is based on a review of whether the proposed beneficial uses of off-spec fiber cement siding and tile backer waste meet the case-specific beneficial use performance criteria outlined in OAR 340-093-0290.

Please note that this BUD covers only off-spec fiber cement siding and tile backer waste and no other wastes generated by the White City Facility.

If you have any questions about this BUD, please contact David Esch at 541-776-6148.

Sincerely,



Brian Fuller, Manager  
Western Region Materials Management Program

cc: Denise Miller – DEQ, Eugene