

Permit Evaluation

Oregon Department of Environmental Quality Northwest Region Office 700 NE Multnomah Street Portland, OR 97232

Feb. 16, 2022

Updated April 7, 2022

To: Facility File

From: Inez Lawson

Solid Waste Inspector

Subject: Solid Waste Permit Evaluation Report

Ridwell Portland Warehouse

Multnomah County

Solid Waste Disposal Site Permit 1707 – Transfer Station/Material Recover

Facility Permit

Background

Ridwell Inc. is an existing business that has established operations in Portland. They provide a service to collect hard to recycle waste materials from homes for a monthly service fee. These waste materials may include plastic film, household batteries, fluorescent light bulbs, plastic clamshells, expanded polystyrene (EPS) and clothing. Occasionally other materials may be collected, those could include bottle caps, handheld tools, crayons or other materials.

On June 30, 2021, DEQ staff toured Ridwell's Portland facility located at 7006 NE 79th Ct, Portland, OR 97218. Ridwell operates a solid waste disposal site as defined in Oregon law and rules and accepts solid wastes including light bulbs, fluorescent light tubes, batteries, plastics, styrofoam and other wastes. These wastes may contain metals such as mercury, lead, nickel, lithium or other pollutants that may constitute a potential threat of adverse impact on the environment or public health. On Sept. 13, 2021, DEQ sent Ridwell a letter asking Ridwell to apply for a DEQ solid waste permit by Oct. 15, 2021. On Oct. 11, 2021, DEQ received a request from Ridwell asking for a 30-day extension to submit the DEQ solid waste permit application. On Oct. 13, 2021, DEQ granted an extension until Nov. 15, 2021, for Ridwell to submit a DEQ solid waste permit application. DEQ did not receive a solid waste permit application by Nov. 15, 2021.

On Nov. 17, 2021, DEQ sent a warning letter to Ridwell requesting that Ridwell submit a solid waste permit application by Nov. 30, 2021. On Nov. 29, 2021, DEQ received a solid waste permit application from Ridwell.

Land Use Approval

DEQ received a signed land use compatibility statement from the City of Portland Planning Department dated Sept. 23, 2021, confirming the proposed facility is compatible with local land use plan. This facility is located in General Employment 2 (EG2) zone which allows industrial service use by right in this zone.

SWDP 1707 Multnomah County Permit Evaluation Memo Feb. 16, 2022 Updated April 7, 2022 Page 2 of 3

Facility Operation

The facility is approximately 10,000 square feet, with an additional 2,000 square feet for dedicated office spaces. This facility is not open to the public or any other haulers. All materials collected from members are placed into individual canvas bags based on material type, materials are screened by trained Ridwell employees prior to pick-up. These materials are transported in enclosed vehicles. Ridwell employees unload materials into the appropriate staging and sorting areas within the warehouse. Wastes are handled according to specific requirements for each material type. Wastes are stored onsite, indoors at all times and transported offsite at regular intervals. Ridwell submitted a special waste management plan for household batteries and bulbs as part of the solid waste operations plan. Nuisance prevention procedures are described in the operation plan to minimize any potential dust, noise, vectors and malodors from facility operations.

Environmental Concerns

Ridwell has submitted sufficient information for site characterization, as required by OAR 340-093-0070(3)(e). All material processing occurs indoors. Ridwell will be handling household batteries and bulbs. These materials pose environmental and human health risks if managed improperly. The submitted special waste management plan covers sections such as handling procedures to reduce fire risk and breakage, maintaining spill kits, proper PPE and training for staff handling materials.

Financial Assurance Risk Screening

OAR 340-096-0001 provides the authority for DEQ to require financial assurance for disposal facilities and to exempt low-risk facilities from those requirements. DEQ evaluated the information submitted as part of the permit application, recent inspection report and additional information gathered by DEQ staff. DEQ finds that Ridwell Portland Warehouse facility is a low-risk facility for financial assurance and is therefore exempt from financial assurance requirements. This determination is based on the wastes accepted, collection, handling and storage procedures and that the wastes are not deposited permanently at the site but are removed regularly. DEQ staff will review the determination when the permit is modified or renewed or when information suggests the criteria for exemption are no longer being met.

Permitting Timeline

- Nov. 19, 2021, DEQ received a solid waste permit application from Ridwell
- Jan. 17, 2022, DEQ determined the application for a Solid Waste Disposal Site Transfer Station/Material Recover Facility permit was complete
- Feb. 25, 2022, DEQ issues Public Notice
- March 30, 2022, DEQ holds Public Hearing

Permit Discussion

The draft permit provides conditions for allowable activities, operations and general conditions that include recordkeeping and administrative requirements. DEQ will conduct regular compliance inspections.

Public Notice

SWDP 1707 Multnomah County Permit Evaluation Memo Feb. 16, 2022 Updated April 7, 2022 Page 3 of 3

DEQ issues a public notice on Feb. 25, 2022, that closed April 5, 2022, and conducted a virtual public hearing on March 30, 2022. DEQ received no verbal comments at the public hearing. DEQ received no comments during the public comment period.

Recommendation

DEQ has determined that Ridwell Portland Warehouse is able to comply with solid waste permitting requirements and will issue the permit.