



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Materials Management Program

700 NE Multnomah Street, Suite 600

Portland, OR 97232

(503) 229-5696

FAX (503) 229-5675

TTY 711

August 25, 2026

Tricia Conroy
Executive Director
MRM
tricia.conroy@mrmrecycling.com

RE: 2027 Oregon E-Cycles Program Plan

Dear Tricia,

Thank you for the initial program plan that MRM submitted to the Department of Environmental Quality (DEQ) on June 26, 2026, for the 2027 Oregon E-Cycles Program. As part of DEQ's plan review process, DEQ posted online all plans received and provided a public input period. This response letter and public input received will be posted on the [Oregon E-Cycles website](#).

After reviewing MRM's program plan and considering input received from the public, **DEQ rejects MRM's 2027 proposed plan.**

Reasons for rejection, including required revisions or requests for additional information, are listed directly in MRM's program plan proposal. At a high level, the program plan should be revised to include:

- A comprehensive proposal describing how MRM will conduct program education and public awareness per ORS 459A.327(1);
- Information describing how the program will ensure environmentally sound management practices as required at ORS 459A.320(2)(b) and OAR 340-098-0245;
- Updated information to the proposed collection network (including shape file, Appendix C and alternative compliance table) for DEQ to evaluate whether the program proposal meets the requirements of a collection network as described at ORS 459A.320(d). DEQ is unable to analyze the proposed convenience network with out-of-date information that was provided; and
- Clear and measurable goals as required at ORS 459A.320(2)(e)(A) – this includes goals for:
 - Collection, such as amount collected or usage rates of collection services; and
 - Maintaining high public awareness of the program;
- Other clarifying details describing how and when program activities will be carried out and how the PRO has determined that proposed activities are sufficient, as described in DEQ's comments.

As required in statute, MRM must submit a revised plan to DEQ within 45 days of the date of this letter. By Friday, October 9, 2026, please submit (1) a clean copy of the revised plan in an editable format and (2) a copy of the revised plan with edits showing changes made to the revised plan, for DEQ's review.

If you have any questions, please don't hesitate to reach out to program staff, by phone or email. Rachel Harding can be reached at 503-929-7125 or Rachel.Harding@deq.oregon.gov.

Thank you,



Cheryl Grabham (Aug 25, 2026 14:47:39 PDT)

Cheryl Grabham
Materials Management Program Manager
Oregon Department of Environmental Quality