



# Oregon

Tina Kotek, Governor

Department of Environmental Quality  
Materials Management Program  
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August 29, 2025

Tricia Conroy  
Executive Director  
MRM  
[tricia.conroy@mrmrecycling.com](mailto:tricia.conroy@mrmrecycling.com)

RE: 2026 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 July 1, 2025, for the 2026 Oregon E-Cycles Program. As part of DEQ's plan review process, DEQ posted online all plans received and provided for a public input period. Input received was also posted online.

After reviewing MRM's program plan, and with the consideration of input received from the public, **DEQ rejects MRM's proposed plan**. Reasons for rejection, including required revisions or requests for additional information, are listed directly in MRM's draft program plan for easier review. DEQ's comments will be made publicly available online as well. At a high level, the program plan should be revised to include:

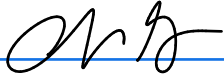
- Objective and measurable details describing how and when program activities will be carried out and how the PRO has determined that proposed activities are sufficient, including how activities: fully finance the program per ORS 459A.320(2)(a); provide for environmentally sound management practices as required at ORS 459A.320(2)(b); provide fair financial compensation as required at ORS 459A.320(3)(c), and additional areas as described in the attached comments;
- Updated information to the proposed collection network in order to evaluate whether the program proposal meets the requirements of a collection network as described at ORS 459A.320(d); and
- Sufficient details explaining how the program will be carried out successfully, whether there is one or multiple PROs. DEQ appreciates MRM's capabilities, but the plan should also show how responsibilities will be fulfilled, in the event that multiple PROs are carrying out these responsibilities.

DEQ looks forward to receiving a revised plan from MRM within 45 days of this date. By Monday, October 13, 2025, 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. Within 45 days of receiving a revised plan, DEQ will approve, approve with conditions or reject the revised plan, as required at ORS 459A.321(3).

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](mailto:Rachel.Harding@deq.oregon.gov).

Thank you,

A handwritten signature in black ink, appearing to read 'Cheryl', is positioned above a horizontal blue line.

Cheryl Grabham (Aug 28, 2025 10:10:43 PDT)

Cheryl Grabham  
Materials Management Program Manager  
Oregon Department of Environmental Quality

Attachment: Comments on MRM's July 1, 2025 program plan proposal