



State of Oregon Department of Environmental Quality

DEQ's Comments on 2019 Oregon Paint Stewardship Program Annual Report

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Questions, Comments and Suggestions

Below are DEQ's questions and comments to PaintCare on the 2019 Annual Report as well as some suggestions for improvements to annual reports.

- 1) The number of PaintCare events decreased from 8 to 4. Will you please provide some insight into the decrease?
- 2) A comparison of the two GIS maps revealed that the top map marked the HHW collection sites even though they were not listed in the legend. Also, if possible, for the second map, it would be helpful to see the 15 mile coverage area associated with collection events – PaintCare and others – in a different color. This would make it easier for a reader to tell what areas were served by the additions of the collection events.
- 3) There is a minor error on page 10 Section B2 (copied below). In the copied statement, *or event* should be deleted. An area is considered underserved if a permanent collection site does not serve the population within 15 miles; the absence of a collection site is the reason a collection event should be held in the underserved area.
 - a. “An area is defined as underserved if it is not within 15 miles of a paint drop-off site ~~or event.~~”
- 4) Additionally, the description in the report about service for underserved residents could be improve. The description in the report says “Based on GIS analysis, approximately 1.9% of the state’s population lives outside of a 15-mile radius of a permanent drop-off site or event”. Since the purpose of collection events is to improve service to underserved areas, it would be more helpful to see the value pertaining to the impact of adding events. The information exists in the report, as the report describes the number of residents residing within 15 miles of a collection site, 96.7%, and how that changes when events are added, 98.1%.
- 5) On page 15 in section C about Container Recycling, an amount for cans going to landfill should be included. The report is required to describe the amounts going to all disposition methods – 459A.842(1)(d), not just recycling methods.
- 6) As part of the outreach to retailers, was any material also sent to retailers that only sell into the State online?
- 7) As it relates to an evaluation of the methods used to disseminate education materials and an assessment of the effectiveness of the education and outreach, we recognize this has some

overlap with the public awareness and postconsumer paint reduction goals and their respective implementation plans still being developed. When the implementation plan is finalized, it should describe not only methods for assessing public awareness and postconsumer reduction, but also methods that will determine the best techniques for disseminating the education materials. Some suggestions to consider include surveying residents to see if they find the material understandable and informative; estimates for how many residents followed the guidance if they read it; what delivery method(s) are preferred; and which method(s) residents think would be most effective. As methods for assessing changes in waste prevention, consider if assessing paint cans at time of drop-off would be beneficial, such as seeing if the volume per can is lower; the program is receiving fewer cans or fewer cans compared to sales. For reuse, increase in the amount of reuse might be an estimate; another approach could be to survey residents at time of drop-off to see if they considered reuse or donations first. We look forward to the completion of the updated program plan and inclusion of goals and evaluations in future annual reports.

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.