

Meeting 2: Technical Workgroup for Recycling Acceptance Lists

Recycling Modernization Act, Rulemaking 3

Dec. 15, 2025
Held online via Teams

Meeting logistics and protocol

Please keep your microphone on mute when not speaking; if not a workgroup member please keep camera off to limit disruptions

Committee members and DEQ staff are here as participants, audience as observers

- Public input is scheduled for 3:50 p.m., sign ups to occur at that time

For each meeting, please:

- Stay focused on the specific agenda topics for each meeting
- Comment constructively and in good faith
- Treat everyone and his or her opinions with respect
- Allow one person to speak at a time

Agenda

Time	Topic
2:30 p.m.	Welcome and agenda review
2:35 p.m.	Discussion: Pesticides and disinfectants
3:00 p.m.	Discussion: Aerosol packaging
3:50 p.m.	Public input
3:58 p.m.	Next steps
4 p.m.	Adjourn

All times are approximate and subject to change based on committee needs

Facilitated discussion: Pesticides and disinfectants

Question: Clarify that packaging of pesticides used as disinfectants (e.g., bleach wipes) are/are not excluded from acceptance in the Uniform Statewide Collection List.

OAR 340-090-0630(2)(j):

(2) Local Government Recycling Acceptance List. The following material must be collected pursuant to ORS 459A.005 and ORS 459A.914(1)(a) to provide the opportunity to recycle:

(j) Plastic that fits loosely in the generator's provided on-route collection container, **excluding any such item that was used to contain or store** motor oil, antifreeze, or other automotive fluids, **pesticides or herbicides**, or other hazardous materials (flammable, corrosive, reactive, toxic), as follows:

(A) Plastic bottles that measure at least two inches in each of two or more dimensions, including caps if screwed on, made of the following materials:

- (i) PET (#1) (clear only);
- (ii) HDPE (#2); and
- (iii) PP (#5)

(B) Plastic tubs that measure at least two inches in each of two or more dimensions, including caps if screwed on, made of the following materials:

- (i) PET (#1);
- (ii) HDPE (#2); and
- (iii) PP (#5)

(C) Plastic buckets, pails, and storage containers, including lids if snapped on, made of the following materials:

- (i) HDPE (#2); and
- (ii) PP (#5)

(D) Nursery (plant) packaging, such as pots and trays, made of the following materials:

- (i) HDPE (#2); and
- (ii) PP

Facilitated discussion: Aerosol packaging

History

- Pre-RMA: commingled collection in some areas of the state, not others
- 2022-2023 Rulemaking:
 - Health and safety concerns from commingled processing facilities
 - Placement on PRO Recycling Acceptance List + convenience and performance standards
 - Rule to allow continued commingled collection under specific circumstances ("bridge")
- Cost concerns from CAA
 - 2024 Rulemaking delayed start of PRO Recycling Acceptance Listing to Jan. 1 2028
 - [CAA Program Plan](#): intent to propose onramping empty, non-hazardous aerosols to the Uniform Statewide Collection List
 - Formal CAA "[Practicability Study](#)"
- 2025: Request from Metro-area local governments to continue commingled collections, empty and non-hazardous only
- 2022 – present: [Aerosol Recycling Initiative](#)



Facilitated discussion: Aerosol packaging

2025-2026 Rulemaking (RMA Rulemaking #3)

- CAA's proposal to onramp empty, non-hazardous aerosols to the Uniform Statewide Collection List is a separate process
 - CAA's proposal is not yet available and it is premature to predict the content, or the outcome
 - In this rulemaking, we need to consider the current rules and how they might be changed whether or not CAA's onramping proposal is accepted
- Options in scope of rulemaking consideration:
 - Some form of depot collection for all or some subset of aerosol packaging
 - No collection under the RMA
- According to CAA, one of the challenges with depot collection under the current rules are the special performance standards for aerosols

Facilitated discussion: Aerosol packaging

Existing Performance Standard

- General performance standards (all depot materials) at OAR 340-090-0650(1)
- Aerosol packaging specific performance standards at OAR 340-090-0650(3)(b):

(b) Aerosol cans and pressurized cylinders:

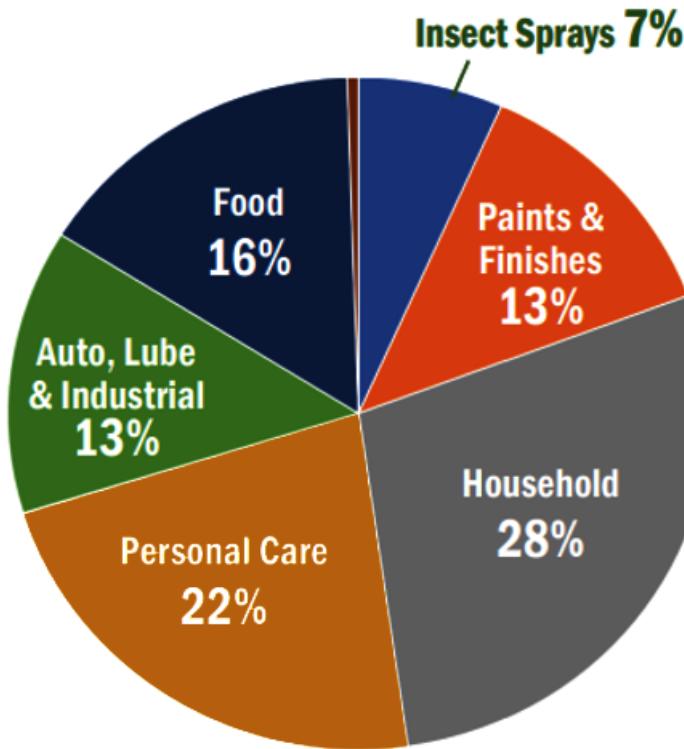
(A) A producer responsibility organization may not accept aerosol cans or pressurized cylinders from any non-residential generator unless that non-residential generator affirms in writing its status as a very small quantity generator pursuant to 40 CFR 260.10 and 40 CFR part 262. Any collection point that accepts aerosol cans or pressurized cylinders must be staffed and have acceptance protocols in place to ensure that it does not accept any non-exempt hazardous waste.

(B) A producer responsibility organization shall ensure that all aerosol cans collected pursuant to ORS 459A.896(1) are managed according to universal waste standards pursuant to 40 CFR part 273. Aerosol cans shall be punctured and their contents safely removed, characterized, and managed in accordance with applicable hazardous waste standards where appropriate, prior to sending the empty container to be recycled. The handler of the containers shall meet the standards of 40 CFR 273.13(e)(4) which include but are not limited to following a written procedure for puncturing cans, conducting a hazardous waste determination of all contents, puncturing the cans with a device designed for that purpose, handling waste from the cans safely and recycling the metal.

Facilitated discussion: Aerosol packaging

From the Aerosol Recycling Initiative (HCPA and CMI):

PRODUCT CATEOGORY BREAKDOWN FOR AEROSOLS IN THE U.S.



SOURCE: HCPA AEROSOL PRESSURIZED PRODUCTS SURVEY⁶

Public input

- Please use the “raise hand” function to indicate your request to speak
 - Or: Send a chat to Stephanie Caldera if you can’t access this function
- Please limit your statements to 1-2 minutes
- This is not a formal public comment opportunity

Copies or supporting materials can be emailed to Stephanie Caldera, through rulemaking email:
RMARulemaking3@deq.Oregon.gov



Other opportunities for public involvement

- Sign-up for email updates ([GovDelivery](#))
- Review meeting materials and agendas
- Provide brief input during or after each meeting
- **Submit formal comments on draft rules in September 2026**



Next steps

Next meeting: Additional meeting(s) to be scheduled for early 2026, dates and times TBD

Feedback: RMARulemaking3@deq.Oregon.gov

DEQ contact information

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- [Technical Workgroup website](#)

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