



RMA – Material Disposition Reporting

Sept. 30, 2025

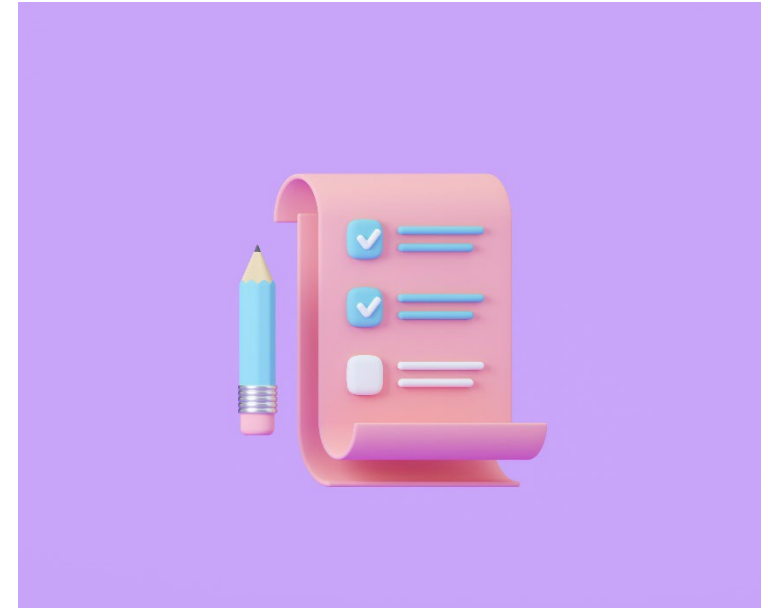
Agenda

Disposition Reporting Framework

- Background
- Underlying concepts (introducing ratios)
- How reporting will work, FAQs
- Data validation and auditing

CRPF Updates

- Transactional Reporting
- Acknowledgement Process



Today's presenters/facilitators



Justin Gast, Materials Management Specialist, DEQ HQ



Nicole Portley, PRO Plan Lead, DEQ HQ

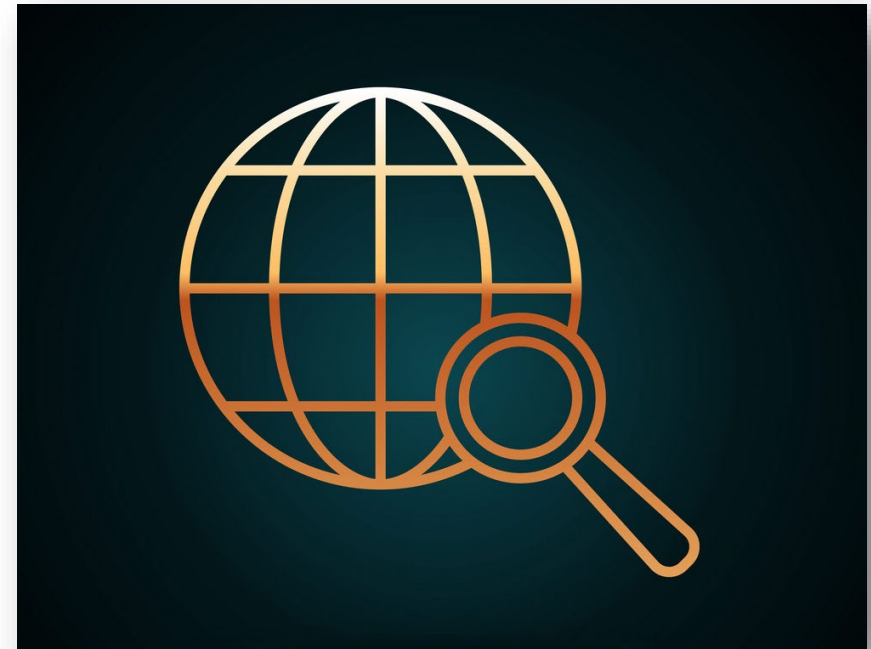


Steven Chang, Lead CRPF Permit Writer, DEQ NWR

Disposition Reporting: Background

Why do CRPFs need to report disposition?

- The data will help restore and maintain public trust in the system.
- This reporting is statutorily required.
- This reporting will indicate locations that require PRO verification of REMs (it will enable the PRO to meet its requirements).



Other reasons to have disposition reporting



- Disposition reporting from secondary processors to be used to help determine CRPF capture rates.
- Disposition reporting can be used to validate / flag concerns with end market yield (60% yield requirement).
- Disposition data will also be used to update the weighting factors associated with Average Commodity Value (OAR 340-090-0820(3)).

Disposition reporting requirements

OAR 340-096-0310

Applies to **all materials** that a CRPF markets.

For these materials, **the CRPF must:**

- **Indicate entities** listed in OAR [340-090-0670\(2\)\(a\)](#) that took possession of material [...] including the business or person name, city, state, region, and country.
- **Order the entities sequentially** along the pathway of disposition, with the end market positioned at the end.
- Indicate the **amount of material per category** received in tons by each entity during the quarter.

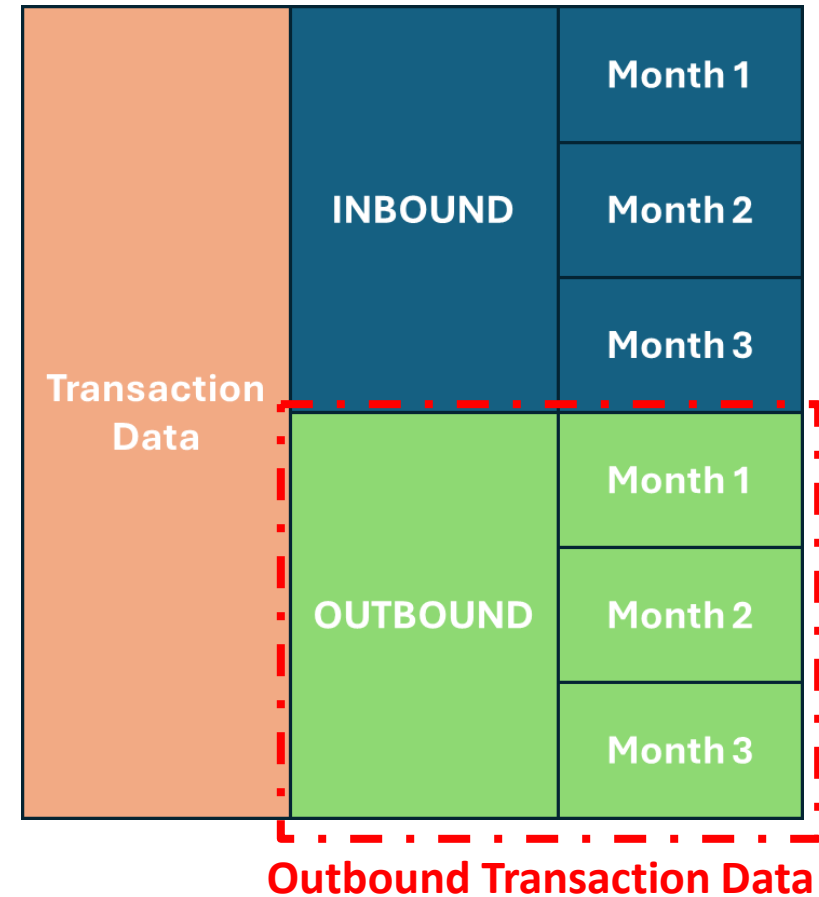
Confidential Business Information

- DEQ has defined “Proprietary Information” as information that is protected as a “Trade Secret”.
- The following information is NOT Proprietary:
 - (a) Information that is publicly available;
 - (d) List of End Markets, including the and amount and type of material received, when aggregated by destination country. Data in the disaggregated form is proprietary.

Disposition Reporting: Underlying Concepts

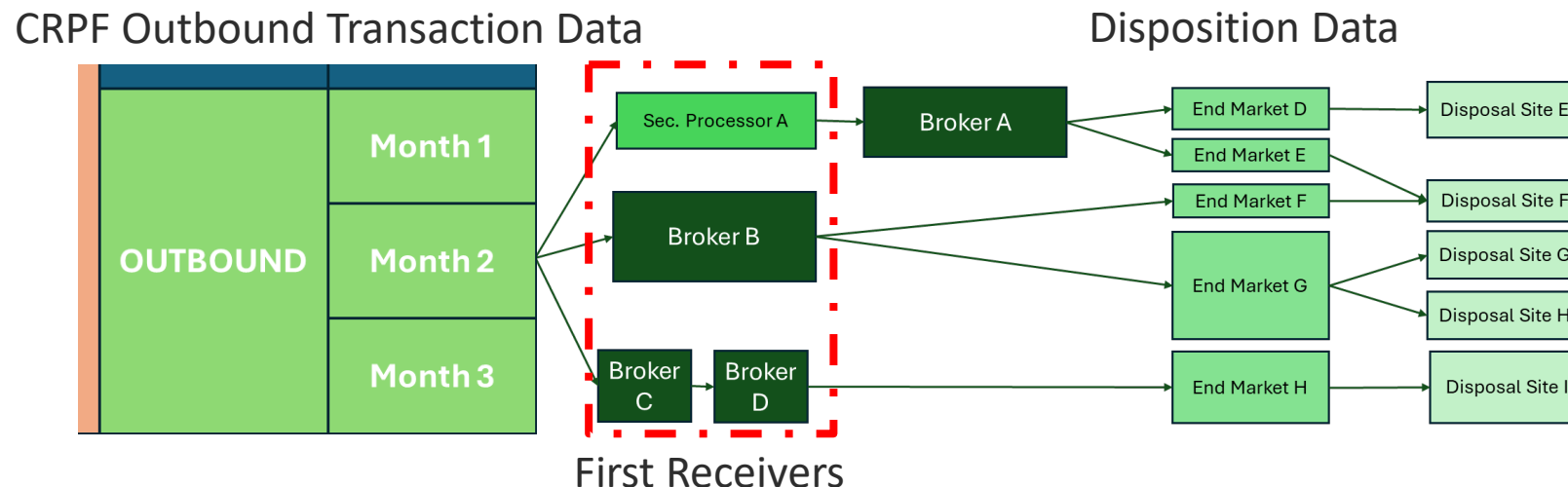
Disposition reporting framework vision

- If *Outbound transactional data* is available and complete from all CRPFs, it can serve as the foundation of the disposition reporting.
 - Transactions can be aggregated for a given quarter.
 - Your DEQ Online (YDO) automation potential.



Disposition reporting framework vision cont.

- OUTBOUND transaction data, rolled up for the quarter, **will contain info about material amounts, categories, and first receivers.**
- OUTBOUND transaction data **is missing information about where material goes beyond the first receiver.** This needs to be filled in.
 - Key consideration: Oregon material mixes with material from other sources at most supply chain facilities. Disposition reporting needs to provide line of sight into where Oregon materials go, without requiring information about non-Oregon materials.



How to fill the gaps: ratios

- **Disposition Ratio**

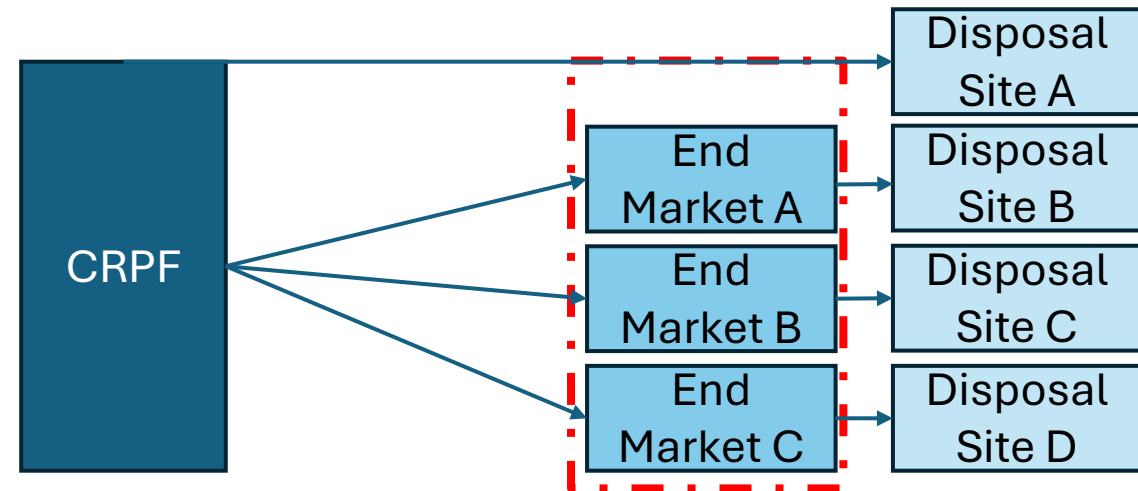
- Average proportion of inbound material that is sent by a given entity to another downstream entity (e.g. end-market, broker, or secondary processor.)
- Excludes disposal.
- Example: Secondary processor received material X from CRPF Y. Of this material received, 20% went to End Market A and 70% went to Broker B.

- **Disposal Ratio**

- Average proportion of inbound material that is sent by a given entity to a disposal facility (e.g. a landfill, incinerator, open dump, burn pile/pit, etc.), excluding process wastewater, air emissions, and on-site process combustion.
- Example: 7% of mixed paper received by Paper Mill G went to Landfill H.

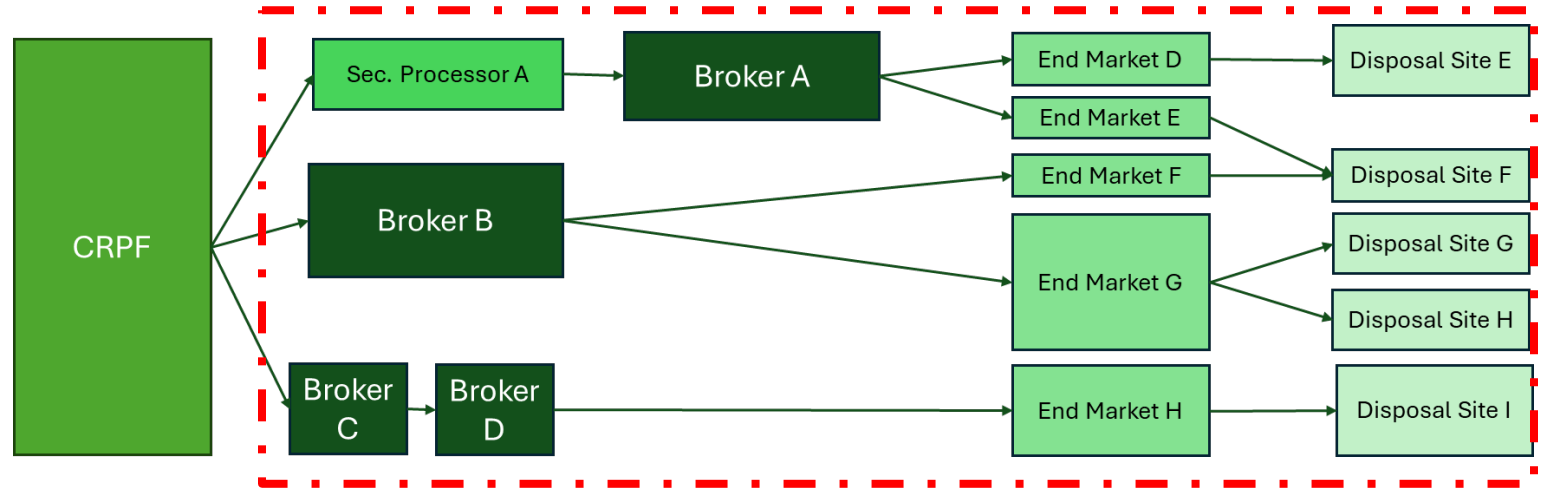
Why ratios?

- Direct tracking of all obligated materials is possible in supply chains with no material mixing, where complete segregation of obligated material is possible.
 - The manifest system used in RCRA for hazardous waste is an example of this.



Why ratios? (cont.)

- In supply chains where materials are mixed with non-program material in their pathways, various accounting methods must be used to keep track of the Oregon-origin material
- Oregon's rules particularly require *proportional* accounting.



Questions?



Disposition reporting framework vision

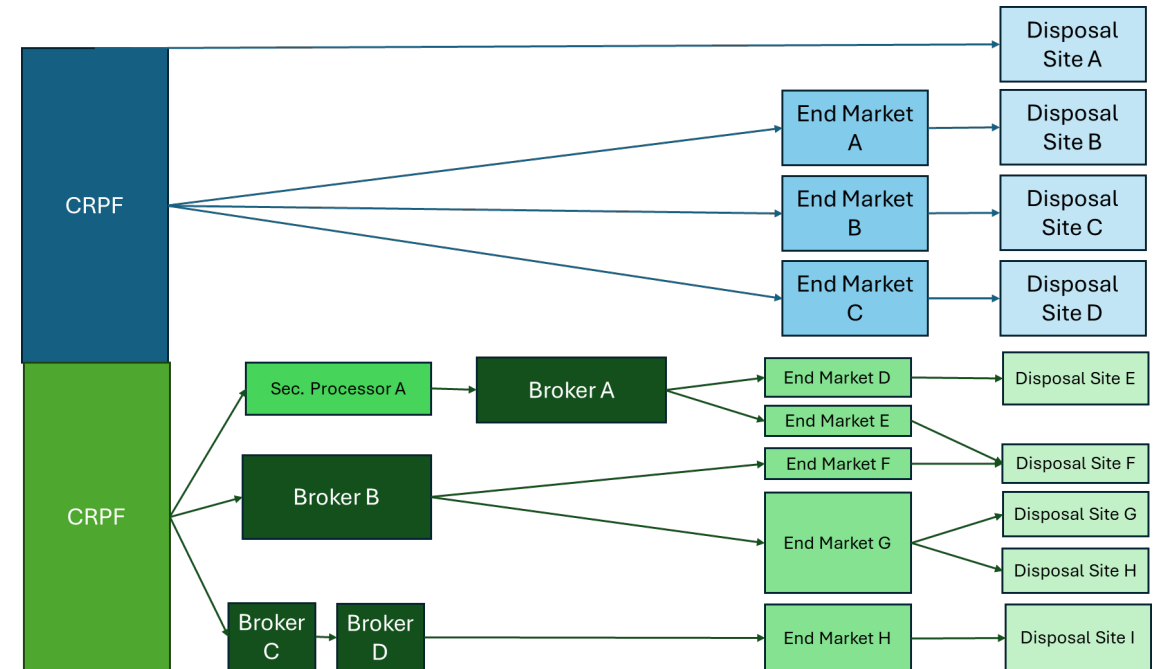
- Two types of pathways:

1. Direct-To-End Market (in blue)

- What's missing from the transactional data? -- reporting of material that went from each end market to disposal.

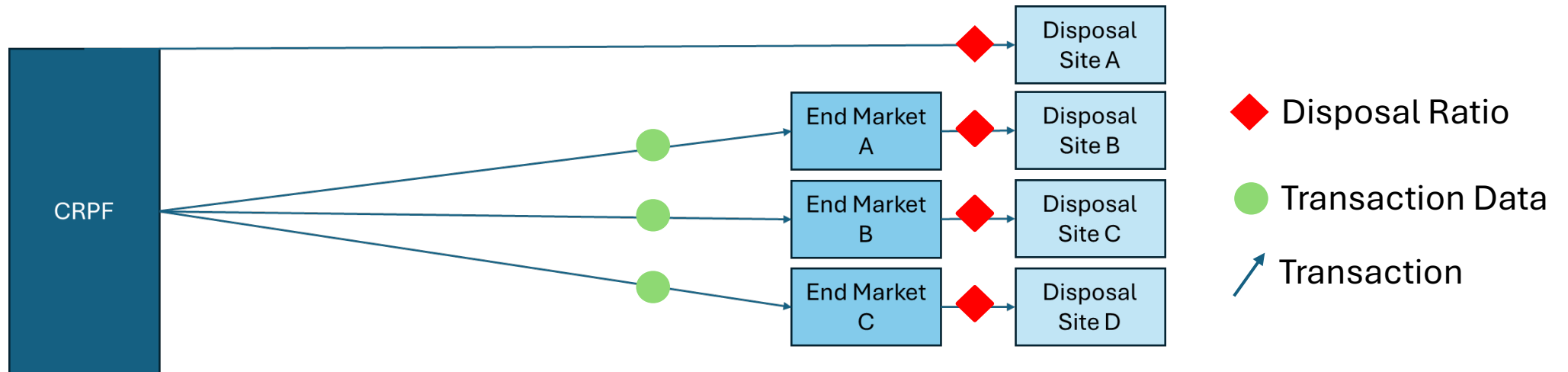
2. Broker-Mediated (in green)

- What's missing from the transactional data? – reporting of disposition downstream from the first receiver, and of disposal



Direct-to-end-market reporting

- Simplest reporting model.
- Basic Process:
 - Summarize and report transaction data from YDO over previous quarter.
 - Parse **OUTBOUND** transactions by **DESTINATION**, including only DESTINATIONS that are “End Markets,” based on Self-Attestation Forms.
 - End-markets to report their disposal sites and the disposal ratio for each material.



Disposal ratios from end-markets

- **Why do we want to know this?**
 - DEQ wants to know if wholesale disposal is happening along the supply chain as well as the magnitude and regularity of any improper disposal.



Disposal ratio FAQs

- What's included / not included in the ratios?
- For what material categories does a supply chain facility need a disposal ratio?
- How should added moisture be accounted for in processes like pulping?



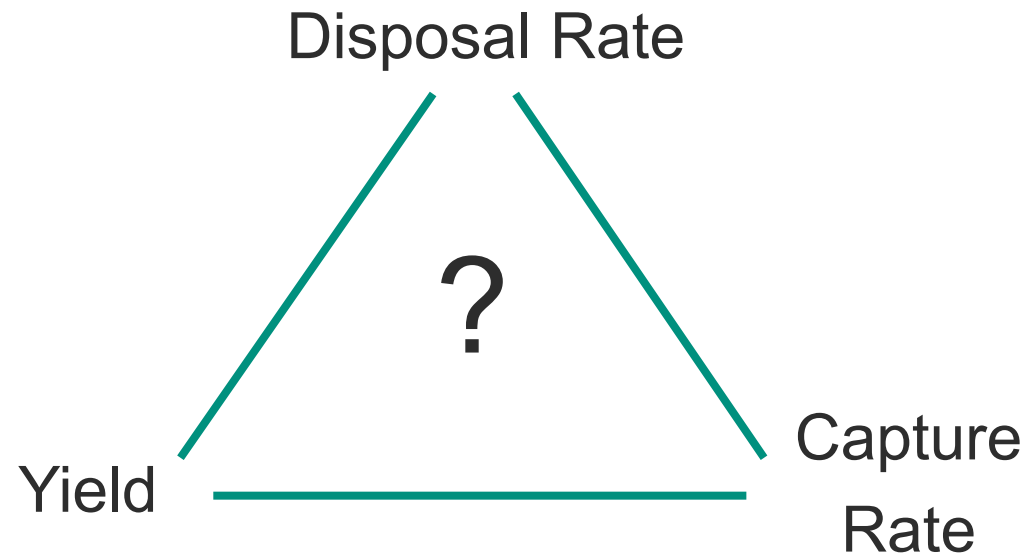
Disposal ratio FAQs (cont.)

- Does the ratio need to be specific to how Oregon material is handled, relative to material from other jurisdictions?
- How often should the ratio be updated?
- Who will gather the ratios?
- **Other questions?**

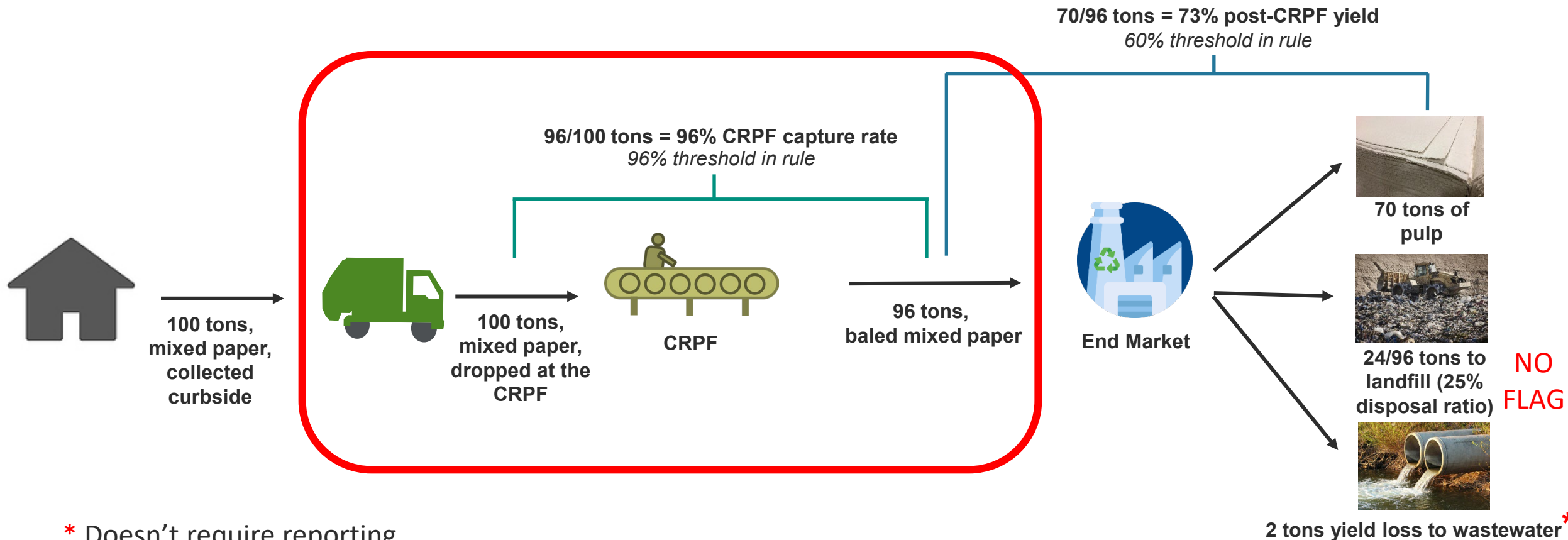


Disposal rate – capture rate - yield

What is the interrelationship among disposal rate, capture rate, and yield?



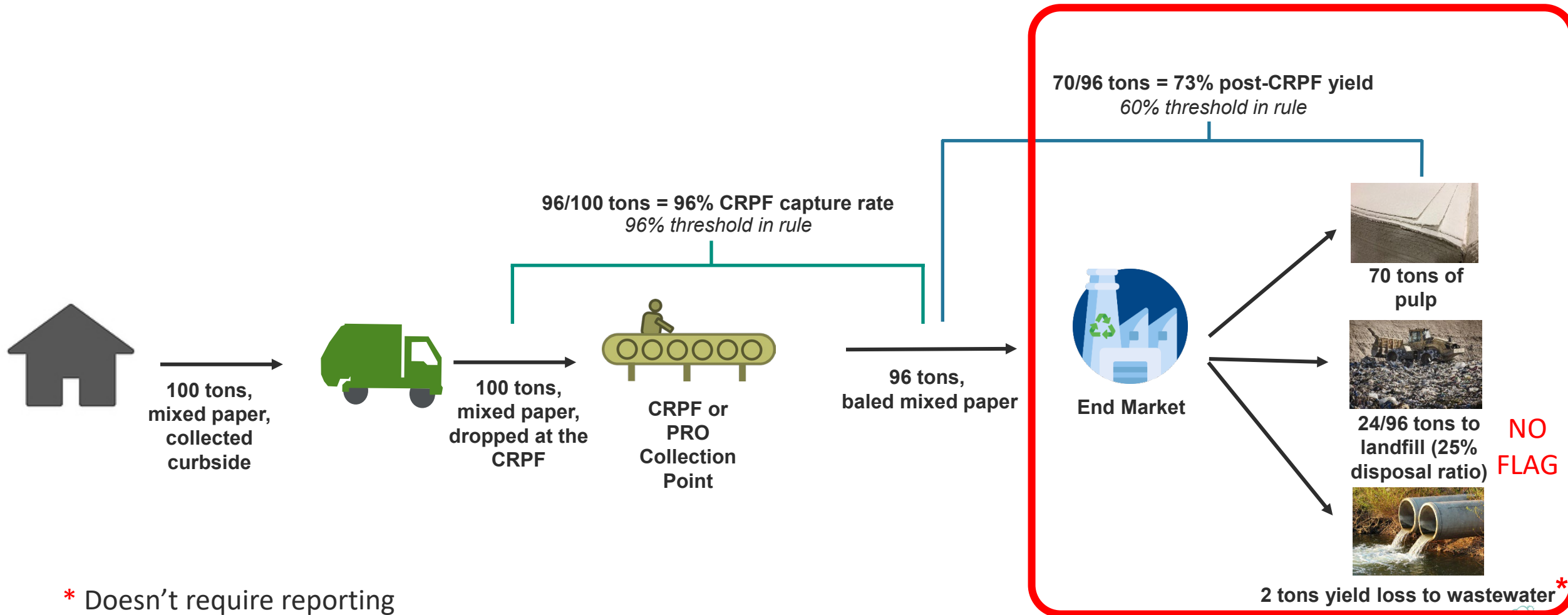
Yield, disposal ratio and capture rate



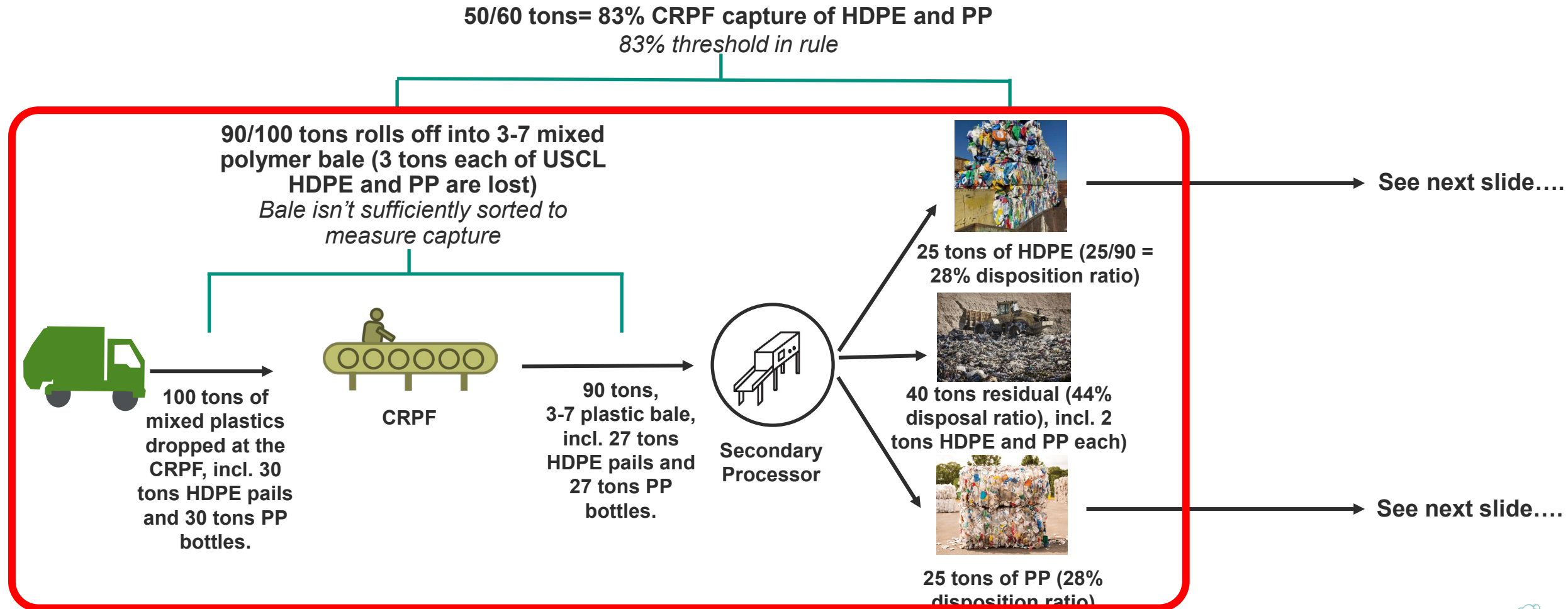
* Doesn't require reporting

2 tons yield loss to wastewater*

Yield, disposal ratio and capture rate



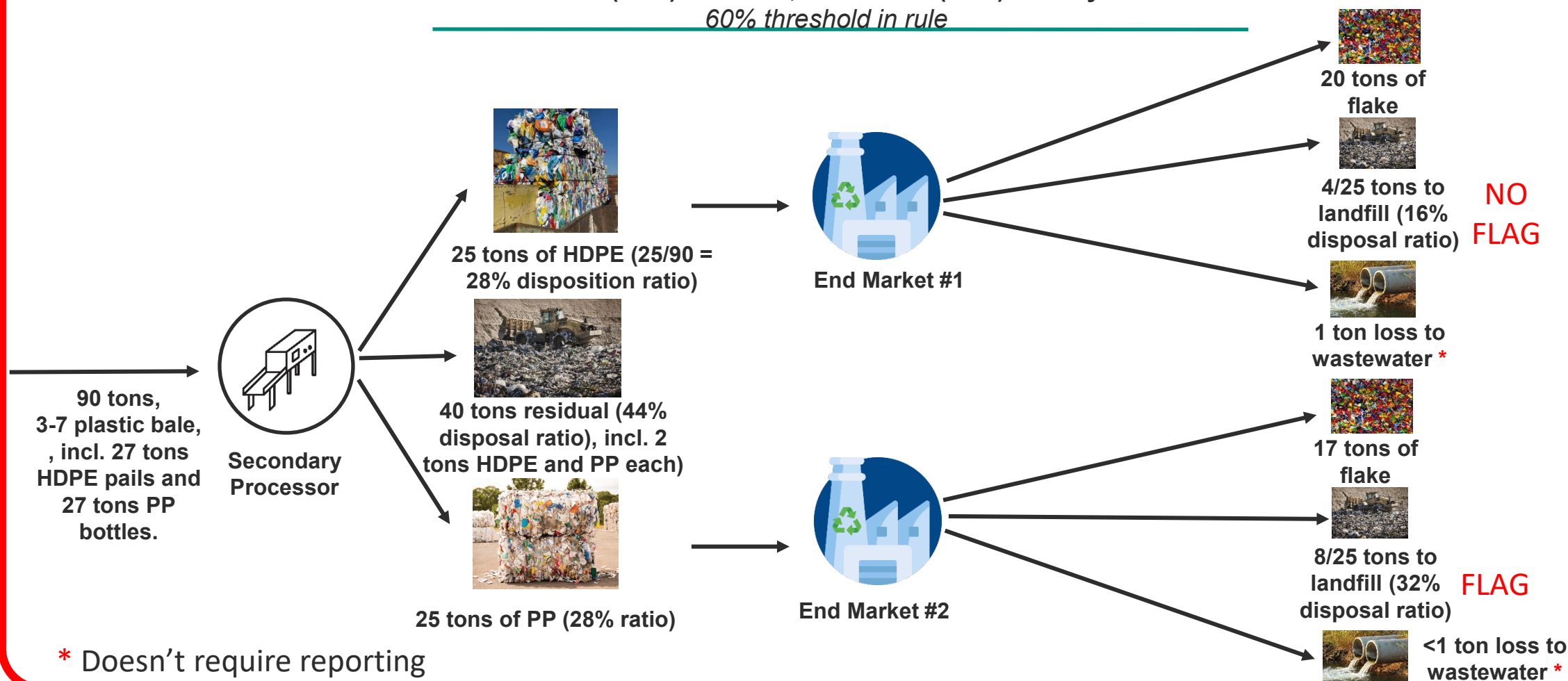
Yield, disposal ratio and capture rate



Yield, disposal ratio and capture rate

20/27 tons (74%) of HDPE, 17/27 tons (63%) of PP yielded

60% threshold in rule



Yield, disposal ratio and capture rate

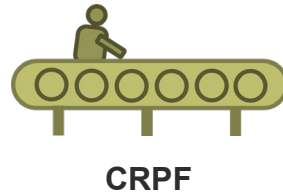
2. End market meets yield thresholds for both materials; therefore, all material sent to the market is treated as captured.

$85.5/90 = 94\%$ CRPF capture of mixed paper
 $9.5 / 10 = 95\%$ CRPF capture of cartons

1. $70/85.5$ tons mixed paper = 82% post-CRPF yield
 $7/9.5$ tons cartons = 73% post-CRPF yield
60% threshold in rule



100 tons of mixed paper dropped at the CRPF, incl. 10 tons of cartons

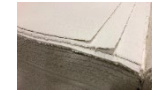


CRPF

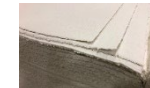
95 tons sent out in a mixed paper bale, with 0.5 tons of cartons and 4.5 tons of mixed paper sent to disposal



End Market



70 tons of pulp from paper



7 tons of pulp from cartons



1 ton loss to wastewater *



17/95 tons to landfill (18% disposal rate)

* Doesn't require reporting

Broker-mediated reporting FAQs

- What if my broker is unwilling to report their downstream customers?
- What if my broker is sending material to a country with restrictions on imports of that particular material?
- Who will brokers report to?
- Who will obtain the ratios?
- **Other questions?**



Form and process for reporting ratios

- Accounting for and recording ratios achieved through quarterly surveys.
 - DEQ to produce a standardized survey form that can be used by each downstream entity to:
 - Confirm receipt of obligated material
 - Confirm Self-Attestation Form Information (Update to latest iteration)
 - Indicate downstream customers and Disposition Ratios
 - Indicate downstream disposal sites and Disposal Ratios



Data Validation and Auditing

Inter-quarter material disposition

- Material that is shipped in one quarter and arrives in the following quarter) is presumed to arrive in the quarter it's shipped.
- DEQ proposes that we assume long-run averages will even out discrepancies across quarters.

Any insights, concerns, or questions?

Feedback is welcome

Data quality assurance and auditing

- *Planned:* Random bale tracking for auditing of location reporting.
- *Subject to negotiation of the verification standard with CAA:*
 - Use of disposal ratios >30% to flag markets where yield could be a concern.
 - Checking of ratios against actual transactional data during facility verifications.



Next steps

- DEQ welcomes comments on the framework through Tuesday October 14, 2025.
- DEQ issues initial detailed guidance and forms by October 23, 2025.
- All entities reporting directly to DEQ undergo YDO training beginning in December 2025.
- First disposition reports due December 15, 2025.
- We may make iterative improvements based on experience.



DEQ welcomes feedback

Please send DEQ feedback via the following:

DEQ NWR Solid Waste Permit Coordinator

SolidWastePermitCoordinator.DEQNWR@deq.oregon.gov

Other Updates

Other relevant updates

- **Transactional Data Quality**

- We appreciate your cooperation and feedback. DEQ is continuously working with system participants to improve this process.
- DEQ may issue updates to the transactional data process in response to feedback.
- Use the Monthly Transactional Data Template when submitting data according to facility permits.



Other relevant updates



- **Acknowledgement Process**
 - Concerns around incomplete use. All non-self-attested markets must have an acknowledgement form.
 - Using these forms assists DEQ and CAA to bring new end-markets into the RMA system.
 - **The Acknowledgement process is TEMPORARY and ends December 31st.**

Questions?



Title VI and alternative formats

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Contact: 800-452-4011 | TTY: 711 | deqinfo@deq.state.or.us