



Oregon

Kate Brown, Governor

Department of Environmental Quality

Northwest Region

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October 17, 2018

Casey Lane
Urban Gypsum, LLC
8823 N Harborsgate
Portland, OR 97203

RE: Beneficial Use Determination (BUD-20180514), Urban Gypsum, LLC

Dear Mr. Lane:

The Department of Environmental Quality (DEQ) has reviewed the September 14, 2018 Urban Gypsum application for a solid waste beneficial use determination for shredded scrap wallboard received at the Urban Gypsum material recovery facility at 8823 N Harborsgate, Portland OR. Wallboard scrap is a byproduct of wallboard manufacturing and recycling. Urban Gypsum estimates approximately 150,000 tons of shredded scrap wallboard will be processed at the Urban Gypsum facility annually.

The application proposes to use the shredded scrap wallboard paper as animal bedding for livestock and the recovered gypsum to be used primarily as a soil amendment. Urban Gypsum proposes to sell bagged gypsum to agricultural supply companies, who will further distribute the recovered materials for use in Oregon, Washington and Idaho.

DEQ has determined that the beneficial use proposal meets the requirements for a case-specific Beneficial Use Determination (BUD) under Oregon Administrative Rule (OAR) 340-093-0260 through 340-093-0290. This BUD is issued to Urban Gypsum and is limited to the materials, approved uses, and conditions specified in the table below. The conditions of the BUD are intended to prevent adverse effects to human health and the environment.

Material	Beneficial Use	Conditions on all Uses
Reclaimed paper backing from asbestos free recovered gypsum wallboard	Animal bedding for livestock	<ol style="list-style-type: none"> 1. The reclaimed paper backing must not contain concentrations of hazardous substances above DEQ approved human health occupational risk-based screening levels. 2. The paper backing must not be stored near water or wetland areas and must not be stored in ways that would allow discharge to groundwater, surface water, or wetland areas. 3. Urban Gypsum must notify prospective users of the conditions of use and provide a copy of this BUD approval. 4. In accordance with OAR 340-093-0280(3)(b), until the time the material is used under the BUD conditions specified, Urban Gypsum and any person that receives the paper backing, must store and manage the material to prevent releases to the environment and nuisance conditions. 5. Every year, Urban Gypsum. must submit a report to DEQ identifying the amount of wallboard received, the amount of gypsum generated, the amount of paper backing recovered, the amount of gypsum transferred to others for re-use, and to whom and for what purpose. Per OAR 340-097-0120(2)(f), Urban Gypsum must include the \$250 reviewing fee with the annual report. The report is due on Feb. 1 of each year. 6. Urban Gypsum must keep records containing the information in #5 above for five years. 7. If manufacturing processes, chemical characteristics, physical characteristics and/or end uses are modified, Urban Gypsum must first have the material re-evaluated to confirm hazardous substances in material are below risk screening levels, prior to beneficial use.

Material	Beneficial Use	Conditions on all Uses
Reclaimed gypsum from asbestos free recovered gypsum wallboard	Soil amendment in agricultural applications	<ol style="list-style-type: none"> <li data-bbox="711 310 1409 447">1. The reclaimed gypsum must not contain concentrations of hazardous substances above DEQ-approved human health occupational risk-based screening levels or naturally occurring background, whichever is higher. <li data-bbox="711 478 1417 615">2. The waste wallboard and reclaimed gypsum must not be stored near water or wetland areas and must not be stored in ways that would allow discharge to groundwater, surface water or wetland areas. <li data-bbox="711 646 1365 751">3. Urban Gypsum must notify prospective users of the conditions of use and provide a copy of this BUD approval. <li data-bbox="711 783 1401 982">4. In accordance with OAR 340-093-0280(3)(b), until the time the material is used under the BUD conditions specified, Urban Gypsum and any person that receives the reclaimed gypsum, must store and manage the material to prevent releases to the environment and nuisance conditions. <li data-bbox="711 1014 1422 1255">5. Every year, Urban Gypsum must submit a report to DEQ identifying the amount of "clean" wallboard received, the amount of gypsum generated, the amount of gypsum transferred to others for re-use, and to whom and for what purpose. Per OAR 340-097-0120(2)(f), Urban Gypsum must include the \$250 reviewing fee with the annual report. The report is due on Feb. 1 of each year. <li data-bbox="711 1287 1328 1350">6. Urban Gypsum must keep records containing the information in #5 above for five years. <li data-bbox="711 1381 1409 1560">7. If manufacturing processes, chemical characteristics, physical characteristics and/or end uses are modified, Urban Gypsum must first have the material re-evaluated to confirm hazardous substances in material are below risk screening levels, prior to beneficial use.

Material	Beneficial Use	Conditions on all Uses
Reclaimed gypsum from asbestos free recovered gypsum wallboard	Feedstock substitute for new wallboard production	<ol style="list-style-type: none"> 1. The reclaimed gypsum must not contain concentrations of hazardous substances above DEQ-approved human health occupational risk-based screening levels or naturally occurring background, whichever is higher. 2. The waste wallboard and reclaimed gypsum must not be stored near water or wetland areas and must not be stored in ways that would allow discharge to groundwater, surface water or wetland areas. 3. Urban Gypsum must notify prospective users of the conditions of use and provide a copy of this BUD approval. 4. In accordance with OAR 340-093-0280(3)(b), until the time the material is used under the BUD conditions specified, Urban Gypsum and any person that receives the reclaimed gypsum, must store and manage the material to prevent releases to the environment and nuisance conditions. 5. Every year, Urban Gypsum must submit a report to DEQ identifying the amount of "clean" wallboard received, the amount of gypsum generated, the amount of gypsum transferred to others for re-use, and to whom and for what purpose. Per OAR 340-097-0120(2)(f), Urban Gypsum must include the \$250 reviewing fee with the annual report. The report is due on Feb. 1 of each year. 6. Urban Gypsum must keep records containing the information in #5 above for five years. 7. If manufacturing processes, chemical characteristics, physical characteristics and/or end uses are modified, Urban Gypsum must first have the material re-evaluated to confirm hazardous substances in material are below risk screening levels, prior to beneficial use.

Material	Beneficial Use	Conditions on all Uses
Reclaimed gypsum from asbestos free recovered gypsum wallboard	Feedstock substitute for concrete production	<ol style="list-style-type: none"> 1. The reclaimed gypsum must not contain concentrations of hazardous substances above DEQ-approved human health occupational risk-based screening levels or naturally occurring background, whichever is higher. 2. The waste wallboard and reclaimed gypsum must not be stored near water or wetland areas and must not be stored in ways that would allow discharge to groundwater, surface water or wetland areas. 3. Urban Gypsum must notify prospective users of the conditions of use and provide a copy of this BUD approval. 4. In accordance with OAR 340-093-0280(3)(b), until the time the material is used under the BUD conditions specified, Urban Gypsum and any person that receives the reclaimed gypsum, must store and manage the material to prevent releases to the environment and nuisance conditions. 5. Every year, Urban Gypsum must submit a report to DEQ identifying the amount of "clean" wallboard received, the amount of gypsum generated, the amount of gypsum transferred to others for re-use, and to whom and for what purpose. Per OAR 340-097-0120(2)(f), Urban Gypsum must include the \$250 reviewing fee with the annual report. The report is due on Feb. 1 of each year. 6. Urban Gypsum must keep records containing the information in #5 above for five years. 7. If manufacturing processes, chemical characteristics, physical characteristics and/or end uses are modified, Urban Gypsum must first have the material re-evaluated to confirm hazardous substances in material are below risk screening levels, prior to beneficial use.

DEQ's determination is based on a review of Urban Gypsum's application for beneficial use of shredded wallboard to be produced at their Portland, Oregon Material Recovery Facility, demonstrating the case-specific beneficial use performance criteria outlined in OAR 340-093-0290 are met for the approved uses. Details of DEQ's review are provided in the attached case-specific evaluation report.

If the characteristics of the wallboard material change, Urban Gypsum must inform DEQ and obtain concurrence that the material meets the BUD criteria.

No other uses are approved. If Urban Gypsum identifies additional uses for the wallboard waste materials, Urban Gypsum must submit a new BUD application for the proposed use for DEQ approval.

Per OAR 340-093-0290(9), DEQ may modify or revoke this case-specific BUD at any time based on new information showing the potential to cause adverse impact to public health, safety, welfare, or the environment.

If you have any questions or concerns please contact Jeremy Fleming (DEQ project manager) by phone at (503) 229-5590 or email at fleming.jeremy@deq.state.or.us. DEQ appreciates your cooperation in protecting Oregon's environment.

Sincerely,



Audrey O'Brien, Manager
Northwest Region Environmental Partnerships

Enclosure: Beneficial Use of Solid Waste Determination Evaluation Report

Cc: Jeremy Fleming, DEQ NWR