



PRO Depots: Collection and Recycling of the PRO Recycling Acceptance List

Revised Jan. 8, 2025: Checklist for Recycling Council program plan review

Subcommittee Members: Taylor Cass Talbott, Jill Hrycyk, Laura Leebrick, Angie Marzano, Vinod Singh and Scott Byrne

DEQ support persons: Rachel Fernandez, Nicole Portley, and Arianne Sperry

Focal plan sections: (1) Operations Plan, PRO Recycling Acceptance List, (2) Appendix F: PRO depot lists and coverage

Required or Guidance Plan Component	Statute or Rule Citation	Plan Section(s)	Summary of DEQ Recommendations That Were Outstanding After Draft 2	Order Recommended by ORSAC to Meet Requirements
6. Methods for achieving convenience standards by supporting and expanding existing collection points and by creating new collection points, including:	ORS 459A.875(2)(a)(B), 459A.896(1), and OAR 340-090-0640	<ul style="list-style-type: none"> • Proposed Approach to Achieving Convenience Standards, pg 60-97 • Start-Up Approach for Establishing the Depot Collection System, pg 105-108 • Appendix D, Stakeholder Engagement, pg D46-48 • Appendix F: PRO Depot Lists and Coverage, pg F56-84 	<p>Ensure and communicate a holistic understanding of what is required by the convenience standards by amending areas of the plan where the convenience standard is mis- or underrepresented.</p> <p>Describe how any proposal for alternative compliance would meet existing and proposed criteria in rule language at OAR 340-090-0640(6).</p> <p>Reflect the results of broad outreach through ORSOP, including partnerships that can collectively deliver a program that meets the standards.</p> <p>Reflect comprehensive research of Oregon facilities that may meet the definition of “existing depot.”</p>	
a description of how the prospective PRO will uphold the requirement to contract, where possible, with existing depots or drop-off centers;	ORS 459.875(2)(a)(B) and ORS 459A.896(1)(a)	Network Analysis and Mapping, pg 62-63	<p>Reflect a full understanding of the breadth of facilities that can meet the definition of “existing depot.”</p> <p>Confirm that CAA will follow OAR 340-090-0640(1)(a) and reach out to all existing recycling depots as defined in rule.</p> <p>Provide a comprehensive list of existing depots and indicate which facilities voiced interest in collecting PRO materials, as well as those that have declined to partner.</p>	
Inclusion of a list of existing depots, with indication of those that are possible and not possible to contract with;	ORS 459.875(2)(a)(B) and	<ul style="list-style-type: none"> • Table 4, Sites that Responded “Yes” to Potentially Hosting a 	<p>Improve the clarity of the tables provided.</p> <p>With respect to tables that prove that CAA is collaborating with existing depots where possible,</p>	

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800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

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	ORS 459A.896 (1)(a)	PRO Materials Depot, pg 64-70 <ul style="list-style-type: none"> Appendix F, Table vi: Sites that Responded “No” to Potentially Hosting a PRO Materials Depot or for which a Response is Pending, pg F63-67 	confirm that sites that meet the “existing depot” definition in rule at OAR 340-090-0640(1) are listed. Do not show events alongside fixed collection points in the same table tracking performance against the convenience standard; use of events should rather be part of an alternative compliance proposal. Aggregate performance against the 95% proximity target at the statewide scale. Clarify where gaps in meeting the convenience standard are located, and the plan to fill each of the gaps.	
Inclusion of tribal depots among the list of “existing depots” and pursuit of efforts to contract with those depots.*	ORS 459A.875(2)(a)(B) and OAR 340-090-0640(1)(a)(C)	<ul style="list-style-type: none"> Equity in the Establishment of a PRO Depot Network, pg 225-226 Appendix F: PRO Depot Lists and Coverage, pg F56-84 	Clarify whether or not contracting with Tribal Environmental Recovery Facility and Grande Ronde depot is on track to go ahead.	
identification of key collaborators that the prospective PRO plans to contract with, including community-based organizations and minority-owned/operated businesses;*	n/a (unless an entity meets the “existing depot” definition at 340-090-0640(1)(a))	<ul style="list-style-type: none"> Closing Gaps to Meet Convenience Standards, pg 70-71 CAA’s Proposed Approach to Equity, pg 224-225 Equity in the Establishment of a PRO Depot Network, pg 225-226 Appendix D, Stakeholder Engagement, pg D46-48 	Provide more clarity in two areas: <ul style="list-style-type: none"> whether or not any CBOs have been identified that operate facilities that meet the definition of “existing depot,” and if so, have they been offered the opportunity to contract, and is partnership moving ahead?, and whether or not any additional CBO partnerships for PRO material collection that have been secured by CAA. Speak to each of these separately, so that DEQ can assess whether or not the base requirement with respect to existing depots has been met.	
a description of how the prospective PRO will engage with local	n/a	<ul style="list-style-type: none"> Closing Gaps to Meet Convenience Standards, pg 70-71 		

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community-based organizations and women and minority-owned businesses to develop collection points;*		<ul style="list-style-type: none"> • Equity in Performance Standards and Collaboration with the Community, pg 104 • Equity in the Establishment of a PRO Depot Network, pg 160 		
plans for providing enhanced convenience to underserved populations;*	OAR 340-090-0640(2)(h)	<ul style="list-style-type: none"> • Underserved Populations, pg 96 • PRO Materials Collection Service to Residential Customers with Disabilities, pg 97 	Describe updated, firmer plans to provide enhanced convenience to underserved populations.	
descriptions of any alternative collection programs being proposed to substitute for convenience standards, including:	OAR 340-090-0640(6)	<ul style="list-style-type: none"> • Closing Gaps to Meet Convenience Standards, pg 70-73 • Running Collection Events, pg 91-92 	Enhance alternative compliance proposals to clarify the specific request(s) and provide the necessary supporting information pursuant to OAR 340-090-0640(6)(c)(A)-(D) for each request.	
an assessment of the impact on the achievement of collection targets;	OAR 340-090-0640(6)(c)(A)		Provide analysis of how each site proposed for alternative compliance impacts collection rates.	
an assessment of the impact on equitable access to and provision of recycling across regions and diverse populations;*	OAR 340-090-0640(6)(c)(B)		Describe how each alternative compliance proposal would impact equitable opportunities to provide and access services.	
demonstrated support of relevant local government(s) for the proposal and a description of how prior consultation with affected local government(s) was taken into account in planning; and	OAR 340-090-0640(6)(c)(C)		Indicate local government support for each alternative compliance proposal.	
an assessment of environmental outcomes.	OAR 340-090-		Assess environmental outcomes of each alternative compliance proposal.	

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	0640(6)(c)(D)			
(for mobile collection events being proposed as an alternative program) the planned frequency of these events and how the proposed schedule will provide adequate predictability for the public.	OAR 340-090-0640(6)(b)		Include this information in the plan.	
(for mobile collection events being proposed as an alternative program) the plan for sufficiently advertising the events	OAR 340-090-0640(6)(b)		Include this information in the plan.	
(for mobile collection events being proposed as an alternative program) how the planned events will uphold best practices for mobile collection events: for example, through pre-event outreach coordinated with relevant local governments, community-based organizations, and service providers; policies and processes to ensure adequate staffing, management of traffic flow, and safety; and contingency plans for responding to larger-than-expected turnout	n/a		CAA could include this information in the plan.	
An accompanying justification if requesting temporary variance from convenience standards.	OAR 340-090-0640(7)		Edit or remove the 15-mile proximity exemption variance, as in metro areas DEQ does not consider 15 miles a convenient distance to travel to a depot.	

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Outlining a plan for depot development that will succeed in meeting collection, convenience and performance standards by the end of the first program plan period.	ORS 459A.875(2)(a)(B)	<ul style="list-style-type: none"> • 10%/65%/100% metric for Goal 2, pg 12 • Administrative Discretion Relating to Block White EPS Collection, pg 92-94 • Start-Up Approach for Establishing the Depot Collection System, pg 105-107 	<p>Include a schedule for both depot start-up and the program plan period itself, including interim benchmarks toward meeting the convenience standard.</p> <p>Confirm that the convenience standard will be met by the end of the first program plan period.</p> <p><u>If there is a compelling reason for why the convenience standard for EPS cannot be met by the end of 2027, lay this out as part of a request for administrative discretion with respect to when DEQ would expect the convenience standard to be met. The request should lay out a timeline for collection system development that includes interim milestones. If costs of densification are part of the rationale, CAA should include cost estimates in its written analysis.</u></p>	
Outlining a plan for depot development start-up activities that collection points have been opened provides continued opportunity to recycle in metro areas where items formerly on local government recycling acceptance lists have moved to the PRO recycling acceptance list.		Start-Up Approach for Establishing the Depot Collection System, pg 105-107		
7. Methods for achievement of performance standards, including	OAR 340-090-0650	Proposed Approach to Addressing Performance Standards, pg 98-104		
a description of how the PRO will monitor sites and services on a regular basis to ensure compliance	OAR 340-090-0650(1)(a)	<ul style="list-style-type: none"> • Annual Audits, pg 100 • Audit Criteria, pg 100 	<p>Clarify how much of the auditing will be on-site vs desktop. Consider an on-site visit for every site as part of the initial year of auditing.</p> <p>Consider auditing more frequently than once a year and adding additional components to the auditing process.</p>	
plans for education and outreach regarding the PRO Recycling Acceptance List in a manner that is clear, culturally relevant, accessible, and understandable to diverse audiences, including through its website	OAR 340-090-0650(1)(c)	Promotion of the PRO Depot Network, pg 103-104	Include a specific approach to educate commercial generators.	

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protocols for minimizing the contamination of materials delivered to collection points, including screening and then accepting and managing the contamination appropriately, rejecting the contamination, or both, and must also include providing service users with information on proper recycling or disposal options for non-accepted materials.	OAR 340-090-0650(1)(e)	Contamination Management, pg 101	Provide more detail on “initial sorting,” as it has permitting implications – where will the sorting occur, how will it be done, etc.	
<p>Information on how expanded polystyrene will be densified before transportation of more than 75 miles, including indication of the proposed method(s) to be used and</p> <p>consideration of impacts on yield</p> <p>consideration of impacts on transport quantities (density)</p> <p>assessment of potential safety and exposure impacts to workers</p>	OAR 340-090-0650(3)(a)(B)	<ul style="list-style-type: none"> • Ensuring Safety and Demonstrating Economic Benefits of Thermal Densification, pg 94-95 • Transporting Undensified EPS as Void Fill Beyond 75 Miles, pg 95-96 	Add more detail about the densification vision and demonstrate consideration of impacts on yield, transport quantities, and worker safety and exposure.	
Other aspects of the plan to set up a network of collection points for PRO Recycling Acceptance list materials, including:	n/a	<ul style="list-style-type: none"> • Criteria for Site Selection, pg 98 • Establishment of Depot Sites and Contracts, pg 99 • Operational Support, pg 99-100 • Compensation, pg 101-102 • Events Compensation, pg 102 • Reuse, pg 103 		

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		<ul style="list-style-type: none"> • Advance Notification, pg 103 		
Principles and methods for compensation of collection point staff;* and	n/a	<ul style="list-style-type: none"> • Establishment of Depot Sites and Contracts, pg 99 • Operational Support, pg 99-100 • Compensation, pg 101-102 • Equity in the Establishment of a PRO Depot Network, pg 225-226 	CAA could add detail on how it will calculate a living wage for CBO-operated collection points.	
Any plans for accommodating collection of reusable packaging within depots and collection points;	n/a	<ul style="list-style-type: none"> • Reuse, pg 103 • Advance Notification, pg 103 	CAA could provide more detail on how it might work with member producers to collect reusable packaging at collection points, perhaps by exploring an example such as reusable wine bottles.	

Subcomponents listed with asterisks indicate subcomponents that are also considered in review/approval of the Equity section.

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