



State of Oregon Department of Environmental Quality

Updated Minimum Convenience Standard Table – December 2024 version

An Update to Appendix 1 of DEQ’s “Rule Concept: Convenience Standards, Collection Targets and Performance Standards for PRO Recycling Services” (originally published Dec. 28, 2022)

December 11, 2024

Background

This document will be updated regularly as circumstances change. In an appendix to a rule concept provided in December 2022 to the first Rulemaking Advisory Committee for the Recycling Modernization Act, DEQ provided an estimate of the minimum number of collection points that a PRO(s) would need to provide across Oregon. Note that “existing depots” are anticipated to comprise the foundation for this network, if they choose to use the opportunity provided in ORS 459A.896(1) to contract with the PRO to provide this service.

Under existing administrative rules, individual materials are designated as requiring either “basic” or “enhanced” collection convenience. These changes and others will start occurring in late 2025 and may be updated pending details described in the approved program plan in early 2025.

- **Materials designated as requiring “basic” convenience include:**
 - Aluminum foil and pressed foil products
 - Shredded paper
 - Block white expanded polystyrene
 - Steel and aluminum aerosol packaging, effective January 1, 2028
 - Single use pressurized cylinders (e.g., propane), effective January 1, 2028

- **Materials designated as requiring “enhanced” convenience include:**
 - Glass packaging
 - Polyethylene film
 - Plastic buckets, pails, and storage containers (HDPE and PP)
 - PE and PP lids
 - HDPE package handles (e.g., 6-pack handles)

The convenience standards now established in rule (OAR 340-090-0640) require a minimum number of collection points in different communities based on the populations of those communities. Original estimates were derived from 2021 population estimates. This document updates those estimates using 2023 population estimates, and corrects several errors that were made in the earlier estimate.

Updated Estimates

Population changes have resulted in a few changes in the number of collection points required for individual communities. In total, DEQ estimates the minimum number of collection points that will be required across the state as approximately 117 collection points for materials designated for “basic”

convenience and 144 collection points for enhanced materials. The actual number of collection points may be higher, due to the presence in some communities of multiple existing collection points that may seek to collect materials.

DEQ does not have information about which existing recycling depots or drop-off sites meeting the definition of being an “existing” facility will be willing and able to collect materials under contract with a PRO, which materials they might be willing to collect, and whether the parties will be successful at executing a contract. Circular Action Alliance, through its Oregon Recycling Systems Optimization Project process and subsequent negotiations with owners of existing sites, is working with existing facilities to generate a more robust estimate.

Table 1 uses 2023 population estimates to provide an estimate of the minimum number of collection points in Oregon.

**Table 1.
Minimum Number of PRO Collection Points for Each Material**

County City	Materials on “Basic” List (e.g. Aluminum foil and pressed foil products, shredded paper, etc.)	Materials on “Enhanced” List (e.g. polyethylene and glass packaging, etc.)
Baker		
Baker City	1	1
Additional collection points	0	0
Benton		
Corvallis	2	3
Philomath	0	1
Additional collection points	1	0
Clackamas		
Canby	1	1
Gladstone	0	1
Happy Valley	1	1
Lake Oswego	1	1
Milwaukie	1	1
Molalla	0	1
Oregon City	1	1
Sandy	0	1
West Linn	1	1
Wilsonville	1	1
Additional collection points	1	0
Clatsop		
Astoria	1	1
Seaside	1	1
Warrenton	0	1
Additional collection points	0	0
Columbia		
St. Helens	1	1
Scappoose	1	1
Additional collection points	0	0
Coos		
Coos Bay	1	1
Coquille	0	1
North Bend	1	1
Additional collection points	0	0

County City	Materials on “Basic” List (e.g. Aluminum foil and pressed foil products, shredded paper, etc.)	Materials on “Enhanced” List (e.g. polyethylene and glass packaging, etc.)
Crook Prineville Additional collection points	1 0	1 0
Curry Brookings Additional collection points	1 0	1 0
Deschutes Bend Redmond Additional collection points	4 2 0	4 2 2
Douglas Reedsport Roseburg Sutherlin Winston Additional collection points	0 1 1 0 1	1 1 1 1 0
Gilliam Any collection points	1	1
Grant Any collection points	1	1
Harney Any collection points	1	1
Hood River Hood River Additional collection points	1 0	1 0
Jackson Ashland Central Point Eagle Point Medford Talent Additional collection points	1 1 1 3 0 0	1 1 1 4 1 0
Jefferson Madras Additional collection points	1 0	1 0
Josephine Grants Pass Additional collection points	2 1	2 1
Klamath Klamath Falls Additional collection points	1 1	1 2
Lake Any collection points	1	1
Lane Cottage Grove Creswell Eugene Florence Junction City Springfield Veneta Additional collection points	1 0 6 1 1 2 0 0	1 1 6 1 1 3 1 0

County City	Materials on “Basic” List (e.g. Aluminum foil and pressed foil products, shredded paper, etc.)	Materials on “Enhanced” List (e.g. polyethylene and glass packaging, etc.)
Lincoln		
Lincoln City	1	1
Newport	1	1
Additional collection points	0	0
Linn		
Albany	2	2
Lebanon	1	1
Sweet Home	1	1
Additional collection points	0	1
Malheur		
Ontario	1	1
Additional collection points	0	1
Marion		
Aumsville	0	1
Keizer	2	2
Salem*	5	6
Silverton	1	1
Stayton	1	1
Woodburn	1	1
Additional collection points	0	0
Morrow		
Boardman	0	1
Additional collection points	1	0
Multnomah		
Fairview	0	1
Gresham	2	3
Portland	9	13
Troutdale	1	1
Additional collection points	2	0
Polk		
Dallas	1	1
Independence	1	1
Monmouth	1	1
Salem*	1	1
Additional collection points	0	0
Sherman		
Any collection point	1	1
Tillamook		
Tillamook	0	1
Additional collection points	1	0
Umatilla		
Hermiston	1	1
Milton-Freewater	1	1
Pendleton	1	1
Umatilla	1	1
Additional collection points	0	0
Union		
La Grande	1	1
Additional collection points	0	0
Wallowa		
Any collection points	1	1

County City	Materials on “Basic” List (e.g. Aluminum foil and pressed foil products, shredded paper, etc.)	Materials on “Enhanced” List (e.g. polyethylene and glass packaging, etc.)
Wasco		
The Dalles	1	1
Additional collection points	0	0
Washington		
Beaverton	2	3
Cornelius	1	1
Forest Grove	1	1
Hillsboro	2	3
Sherwood	1	1
Tigard	1	2
Tualatin	1	1
Additional collection points	2	2
Wheeler		
Any collection point	1	1
Yamhill		
Lafayette	0	1
McMinnville	1	2
Newberg	1	1
Sheridan	0	1
Additional collection points	1	0
Total (Oregon)	117	144

*Salem, Albany and Portland are three Oregon cities that span more than one county and that have populations large enough to each require more than one collection point. However, Salem is the only city where DEQ assumes that in-city collection points would be distributed across multiple counties (one in Polk). The actual distribution of collection points will be determined through the prospective PRO’s program plan.

More context

Number of collection points

The actual number of collection points for each material may be somewhat higher than the numbers shown here. For example, Tillamook County is home to three recycling depots that already provide for collection of expanded polystyrene foam. Under OAR 340-090-0650(2)(a), all three of those sites are eligible for provision of that service under contract to the PRO, whereas the population-based quotas in Table 1 only provide for one collection site in all of Tillamook County. A possible outcome is that all three existing sites would attempt to contract with the PRO (OAR 340-090-0650(2)(a)) and that one of those sites would also satisfy the population-based requirement under OAR 340-090-0650(2)(b), resulting in at least three collection points for expanded polystyrene in that County.

Impacts in rural communities

The potential for the PRO needing to contract with more sites than shown in Table 1 creates a dynamic that is generally more acute in rural areas of the state. For example, Douglas County operates a network of 11 recycling depots, Klamath County provides 12, and Lane County provides approximately 17 (only one of which is located in the Eugene-Springfield area). In those and similar counties, the PRO may need to contract to provide for more collection points than shown in Table 1. In contrast, the entire Portland metropolitan region has fewer existing recycling depots than the population-based quotas will require of the PRO; even if all of those depots seek to contract with the PRO, the PRO will still need to provide for additional collection points to meet the population-based convenience standards shown in Table 1.

Timing

The PRO has the duration of its first program plan (July 1, 2025 – December 31, 2027) to meet the convenience standard in rules, so the minimums shown in Table 1 reflect a service standard to be achieved by the end of 2027.

Changes in the future

In addition, the prospective PRO, in its third program plan (dated December 6, 2024) proposes a materials strategy that would change disposition for several materials on the PRO Recycling Acceptance List – eventually transitioning some to the Uniform Statewide Collection List, and potentially reducing collection of others. As the Recycling Modernization Act continues to be implemented, future amendments to the PRO program plan and future plan submittals, as well as other procedures provided in statute and rule, may result in ongoing changes to the PRO Recycling Acceptance List and convenience standards.

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