



State of Oregon Department of Environmental Quality

Meeting Summary

Plastic Pollution and Recycling Modernization Act

Rulemaking Advisory Committee Meeting 5, March 10, 2023

Purpose of Meeting

On March 10, 2023, DEQ convened the fifth meeting of the Rulemaking Advisory Committee (RAC) for the first of two rulemakings of the Plastic Pollution and Recycling Modernization Act (RMA) via Zoom Webinar. The purpose of the meeting was to:

- Provide updates to previously presented concepts about responsible end markets definition and yield thresholds.
- Provide an overview of a draft implementation transition period proposal.
- Discuss specific materials from the recycling acceptance lists.

Meeting Attendees

Meeting attendees included members of the RMA Rulemaking 1 Rulemaking Advisory Committee (see Attachment 1 for RAC members in attendance), staff members from Oregon Department of Environmental Quality (DEQ), and members of the public.

Welcome, Opening Remarks, and Introductions

Cheryl Grabham, DEQ welcomed everyone to the meeting. Stephanie Caldera, DEQ, provided an overview of how to use the tools in the Zoom webinar, and how to participate if a member wanted to ask questions. Cheryl discussed protocols and provided an overview of the agenda, meeting ground rules, and goals for the meeting.

DEQ project staff participating on the call were introduced. Then Alternate members and the newest RAC member, Pam Barrow, introduced themselves. Then there was a roll call of the committee members, who were asked to introduce themselves and identify which organizations they were representing.

Input and engagement

Cheryl Grabham described the ways RAC members could provide input throughout the process. DEQ clarified that while receiving comments within the 10-day input period helps staff prepare in advance of the following meeting, RAC input is welcome at any time.

RMA Recap and Updates to Rulemaking Timeline

Roxann Nayar presented an overview of the rulemaking, the rule topics, how they fit into the bigger picture of the Act and the larger recycling system. Roxann then provided historical context from the 2017 disruption to international markets when China implemented the National Sword Policy to when the Oregon Legislature adopted the law in 2021. Several challenges in the recycling system were exposed during this time and many of the solutions are found in the Act. Key obligations of the system's different actors were reviewed, highlighting their specific roles once the Act begins implementation, and finally, how the different pieces from rulemaking one relate to the obligations and components of the Act's implementation.

The rulemaking timeline was then shared. With the addition of the sixth RAC meeting, DEQ delayed filing the rulemaking notice, opening the formal public comment period and taking the draft rules to the

Environmental Quality Commission for consideration. DEQ will bring draft rules to the Commission meeting in November.

Discussion:

The RAC asked questions about the intersection between the first and second rulemakings; how the rulemaking process would work if there were unexpected developments with the understanding of materials; who will participate in the generator-facing contamination reduction research; and whether there are opportunities for participation?

DEQ responded with an update on the contracting process that is currently in process. A forum will be convened to share information but details are still being worked out.

Proposal for Implementation Transition Period

Ariane Sperry presented an overview of a proposal for providing a phased-in approach to implementing requirements of the RMA. This transition period would be offered to entities who may be dependent on other elements of RMA implementation, like the availability of PRO funding, before being able to make the changes required of the RMA.

Discussion: DEQ prompted RAC members to share their thoughts on this proposal and the following four questions:

- How might this proposal affect your organization and communities?
- What are potential opportunities and consequences of this approach?
- What's missing from the proposal?
- What questions still need to be answered?

There was general support for this proposal and DEQ received a number of suggestions and questions including:

- When the PRO would start collecting membership fees. DEQ doesn't have a requirement for when the fee collection would occur, but, DEQ does specify when (July 1, 2025) funding must be distributed from the PRO to fund services.
- DEQ should require that the PROs, local governments and MRFs, should all have to meet specific milestones during this period, to ensure progress towards full implementation occurs within a reasonable timeframe.
- Using Ontario's experience, establishing a PRO is very resource intensive; hence, collecting fees in advance is important.
- DEQ was asked to clarify what phasing implementation of the Uniform Statewide Collection List during the first program plan period will look like.
- Can PROs spend money in advance to assist MRFs who will need to update their equipment to accommodate new materials from the list?
- When will MRFs be certified to accept new materials? This will impact local governments who will need to update local codes and ordinances.
- Communicating a phased approach to materials collection to customers may be challenging. There is uncertainty about how a phased transition period will impact fee collection from producers.
- If a larger materials list moves forward, can there be a pilot or test period at the MRFs to confirm the new materials can be recovered?
- Processors would prefer to know what new regulations will be imposed sooner rather than later.
- DEQ should consider the potential consequences of this proposal to the timing of outreach efforts, and DEQ should consider having best practices for local jurisdictions to use as implementation period changes over time.

- It is unclear from the producer’s perspective, how PROs will be collecting fees and making funding available on the July 1, 2025 start date?

DEQ staff noted that there will be statutory deadlines that need to be met in this timeframe and should ensure that progress towards full implementation is made. DEQ made note about the concerns about the transition proposal.

DEQ also clarified:

- The proposal is that the Uniform Statewide Collection List, which consists of all the materials that may be commingled, will go into effect on July 1, 2025, and processing facilities must be prepared to *accept* all the materials on the list. Facilities may send materials to other locations for processing. If a local government can demonstrate a need for delaying acceptance, DEQ may grant an extension until the community is able to accept the materials on the USCL.
- PROs could spend money in advance, but there is no requirement from DEQ to spend money in advance, and there is no requirement for producers to join the PRO in advance.
- PROs will be recruiting producer members in advance of the July 1, 2025 start date. They will have core membership established and identified in time for the PRO program plan review, which is approximately a year before the start date.

Rule Concept: Confidentiality

Nicole Portley introduced the confidentiality rule concept. There are two rules proposed: the first defines proprietary information and the second is about disclosing financial information from negotiations between PROs and depots.

Proprietary information is referenced in statute seven times but is not defined in statute. Statute identifies these types of information as confidential and not subject to public disclosure under the Public Records Act, unless it is aggregated to conceal individual entities’ identity or information. Examples of proprietary information listed in statute include:

- Quarterly disposition reporting of commingled recycling processing facilities
- Producer market share data reported by PROs
- Information from any party furnished to the department upon request regarding control of collected materials and obligations under ORS 459A.860-459A.975

DEQ proposes to define proprietary information as a trade secret, with the definition of trade secret taken from the Oregon Trade Secret Act in ORS 646.461(4). This is defined as, “information including a drawing, cost data, customer list, formula, pattern, compilation, program, device, method, technique or process that: (a) derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.”

The rule for disclosure of financial information proposes a means for DEQ to enforce the price premium cap that allows PROs to bypass the obligation to contract with existing collection points for the materials on the PRO recycling acceptance list. The rule would allow DEQ to collect the information to verify that the price premium cap has been exceeded.

Discussion:

DEQ asked RAC members to consider the proposed rule language. The following are questions and comments from the Committee:

- What would happen if there's a dispute over the price premium? Who would pay and uphold a challenge to whether information must be disclosed?

DEQ responded that staff will look into the dispute resolution process and this area as a topic of interest to ensure that it is addressed.

- Regarding the price premium, 20 percent price difference is likely the threshold that would keep operations local.
- To clarify the proposed language on page 2 of the rule concept, is the example provided about whether there is an irresponsible end market.

DEQ clarified that the example on page 2, that the requirement creates a joint obligation to find a solution if an end market does not meet the criteria to be considered eligible.

- Who oversees determining what information gets disclosed? What happens if one of the parties objects to the disclosure? Who pays for a challenge if a party disagrees with the Department of Justice's decision about information disclosure?

DEQ has a prescriptive process to respond to public records requests. If requested information is identified as being confidential, DEQ works with the owner of the information to find out which information they believe should be redacted. Then DEQ seeks advice from Department of Justice to determine whether the information being claimed as confidential qualifies as being confidential.

- Will the public have access to the information about which end markets are receiving Oregon's waste?

DEQ responded that the end market data will be available in an aggregated form. The rule concept describes the types of data that will not be considered proprietary, and it indicates the degree of data aggregation for the end market.

Rule Concept: Covered Product Estimates

Nicole Portley reviewed the covered product estimate rule concept. The concept addresses when a producer does not have real data for product sales is not available. Estimates could be used in absence of real data but must be accompanied by methodological justifications, if real data is available at a later date, it must be used, and the rule concept incentivizes the use of real data.

Discussion:

DEQ asked RAC members whether they had any questions or had any feedback. The following are questions and comments from the committee:

- There is support for the incentives for providing real information.
- The level of detail for sales data is something producers are trying to understand. There are some situations where producers will not necessarily know if their products are being sold in Oregon. An example provided described where a producer sells their product to a company whose distribution warehouse is located out-of-state. Once the product moves out-of-state, the producer will not know if the product is shipped to Oregon or elsewhere. Knowing the level of detail producers will have to meet is important as they will need to work with each buyer to obtain this information.
- Is there a timeframe on when a producers must move away from relying on estimated data and use actual data? DEQ responded that they would have a year to replace estimates with actual data.
- Could there be an option where a combination of actual data and estimates are used?

- Are eco-modulation adjustments setting a threshold for estimate data versus actual data? DEQ responded that in the rule concept proposed the least favorable fee adjustment would be applied when estimated data is used.

Rule Concept: Entry of New PROs

Nicole Portley reviewed the Entry of New PROs rule concept. The statute does not discuss the timing of when a new PRO could enter the system. The rule concept proposes that new PROs can enter the system to align with the program plan renewal period, but possibly at other times, with DEQ approval.

Discussion:

DEQ asked RAC members for feedback or if they had any questions about this rule concept. Members of the committee asked:

- How will the system account for a potential disruption or change to the existing system if a new PRO enters the system and impacts the market share? How will it be tracked and fit within the 180-day period? DEQ clarified, that entry of a new PRO would initiate a one-year coordination period, where a PRO coordination plan would need to be developed.
- How will the staggering of plans be addressed to ensure that timelines and coordination plans are aligned and consistent for local governments? DEQ responded that this will be addressed in the PRO program plan and plan calendar rules.

Preview of Economic Modeling Study

David Allaway provided a preview of the economic modeling study that DEQ has been working on. This study informed the listing of specific materials on the recycling acceptance lists. Per ORS 459A.914(3) prior to designating any materials to the recycling acceptance lists, the EQC is required to consider several criteria (reference slide 36 of the presentation). A qualitative matrix was used to structure consideration of most of the criteria, but a quantitative approach was used for environmental impacts and economic impacts from a lifecycle perspective, and a third criteria, yield, was used as well.

In our current system, prices are often used a proxy for costs. There are direct costs, which are reflected in market prices, but market prices do not reflect indirect costs to society. Examples of indirect costs to the use of diesel fuel, include exposure to particulate emissions, asthma, and associated health costs. These indirect costs have been externalized, though they are still paid for by society.

DEQ has been directed by the EQC to consider the full costs of recycling, through the 2050 Vision for Materials Management in policy decisions that have major economic consequences, such as these rules.

DEQ hired contractor Cascadia Consulting Group and subcontractors to conduct this study. The study aims to estimate full costs (indirect and direct) for 26 scenarios, which represent a unique combination of variables for more than 40 materials. The study compares the different scenarios to understand the indirect and direct costs.

Discussion: DEQ invited the RAC to provide comments or to ask questions. Members of the RAC provide a number of comments and asked questions.

- When the RMA was first conceptualized it was thought the system would disincentivize the export of some materials overseas but now it sounds like this is not an outcome that can be expected. It is known that when materials are exported, they contribute larger amounts of recyclable materials in the local markets, and that it disincentivizes the local collection of recyclable materials in those markets. If increasing regulations for end markets occurs it will likely increase the cost for recycling and reduce the quantity of recyclable materials collected locally.

Unless the RMA disincentivizes the export of recyclables materials, it will still create contamination and issues in the receiving markets systems.

In response DEQ acknowledged that there are limitations to the RMA. Oregon can only influence the materials originating in Oregon. A true solution would require a globally-coordinated approach, and the RMA does not have that kind of reach.

- Perhaps ecomodulation can be used to incentivize keeping material in Oregon.
- What is in the “moderate” list and if the number of materials on the list are increased, will it increase contamination levels?

DEQ responded that Cascadia’s findings shows that a list that is slightly longer than what is proposed, has a lower net-cost to society. The difference between Cascadia’s scenario and DEQ’s proposal are minimal. The model does assume that a more complicated list will result in more contamination, but the costs are built into the calculations.

- Bale quality standards will be important to realize the model's outcomes in real life.
- Appreciation for including the externalized costs.

Responsible End Markets and Practicability Benchmarks

David Allaway introduced updates about the responsible end market rule, specifically about changes DEQ is proposing to the concept of practicability since it was first introduced in July 2023. DEQ proposed a definition, benchmarks and examples of what practicable could encompass. During the September RAC meeting, DEQ provided a framework, and intended to use the Cascadia Report to explore multiple scenarios, that included consideration of net benefits. Using this information, DEQ is proposing a benchmark of \$2111/ton (2021 dollars). This would be the cap on how much a PRO might be required to pay per ton, if it is discovered that materials are not being managed responsibly. This would only apply to the materials that are not going to a responsible end market.

Discussion: There was some discussion about the proposed scenario in the report, and DEQ clarified that the scenarios were quantifying the internalized and externalized costs from recycling, and the benchmark reflects the difference between the costs considered how much society should be willing to pay for recycling.

Yield Thresholds

Nicole Portley presented an update about the definition of end markets to address input received from ORRA. DEQ was asked to consider eliminating the term ‘recyclate’ and provide an alternative definition of ‘end market’. DEQ has considered both suggestions, and has removed recyclate from the proposed definition, and has rephrased the definition to be more specific about who the end market facility is, by referring to the particular materials processed or produced by the end market.

The obligation to ensure that materials flow to the highest best use – applies only to the PROs and not to processing facilities. Processing facilities must ensure that materials flow to responsible end markets. That is their primarily obligation. The trade association’s proposal to limit end markets to glass beneficiation plants or scrap metal yards and brokers makes sense, in the context of their obligations. But that isn’t the end of the obligation for the PROs. And for materials that flow through commingled processing facilities, PROs rely on disposition information from those facilities. To allow for compliance with the law, we need the processing facilities to report further down the value chain for glass, metals, and certain plastics.

In response to the comments received regarding the yield threshold first introduced in the fourth RAC meeting, Nicole first clarified that there are three types of yield that have been discussed over the last year: yield at commingled recycling processing facilities, also called capture rate, there is the yield from

the recovered materials after processing, and then the third version is the system-wide yield, which combines the capture rate yield and post-processing yield amounts.

To clarify, for the intent of the yield threshold rule concept, DEQ is proposed a yield threshold from post-processing at the commingled recycling processing facility. In DEQ's proposal, this yield would be measured and reported through self-attestation and verification through responsible end market auditing and certification.

Instead of using the 60 percent threshold in rule, an alternative to consider is a yield threshold as the recoverable fraction for different materials on the acceptance lists, for some materials that would mean the percentage could be higher, up to 80 percent.

Discussion: DEQ invited the RAC to provide comments and consider the two options proposed for calculating the yield threshold: 60 percent or using a recoverable fraction.

The RAC asked a number of questions and provided comments including:

- When paper products are being processed, there can be loss from regular contamination and when there are other materials that cannot be recovered. Is this threshold being applied to the materials that are on the acceptance list.
Response: The 60 percent option is not inclusive of contamination (e.g. tape on boxes).
- 60 percent seems like a low threshold for paper. Regarding the clay from magazines example, there is more nuance, depending on whether the clay is being used again.
Response: the 60 percent threshold is low because it is the minimum, but it does cause issues with perception. The thresholds are informed by data that was provided by mills.
- DEQ was asked about why complicated calculations will rely on estimates, and whether this can be verified. Who will be creating these estimates? Is it possible to use a combination of both options?
Response: The nature of processing materials does not lend itself to granular tracking, and best estimates will be relied upon. They will be verified through an auditing process. Currently DEQ is only considering one option or the other.
- The proposed yield option that allows for honest communication with customers is a priority, and building customer confidence is important.
- Recycled feedstock is a term that should be included in the yield threshold definition.
- Both proposed yield threshold options apply downstream of the MRF.

Public input period

DEQ started the public input period at 12:30 p.m. Several representatives of local governments expressed that they support the acceptance list, and that their customers want to see recycling collection expanded.

- Shannon Martin, City of Gresham- expressed support on behalf of the city's residents for the recycling acceptance list. They have heard from the community, who is asking for more opportunities to recycle more materials, and who are not interested in driving to collection depots. Curbside collection should be the convenience standard. The Committee is asked to keep ratepayers in mind as they are considering the list.
- Thomas Egleston, Washington County- Many local governments, including the county, have been working with their communities to expand recycling opportunities. Community

members have been very clear that they want more opportunities to recycle, and the current acceptance list is not ambitious enough. The list in the Portland Metro area is similar to the list being proposed by DEQ, and collection has been successful, with a 9 percent contamination rate as found in a 2016 study.

- Brandon Rogers, PacTech- Supports the modernization of recycling infrastructure in Oregon. PacTech reprocesses post-consumer resin, and is the end market for this material. There is a necessity to modernize the infrastructure to capture more materials, and all options that are available to modernize the system should be considered.
- Pete Chism-Winfield- Supports the statewide collection list. The system will provide transparency, invest in new technology and provide a uniform statewide list. The Portland area has had a comparable list for 11 years, and generates 43 percent of the solid waste in the state. This is a significant opportunity for Oregonians around the state to have the same opportunity to recycle. However, reliance on a depot-system will be challenging for urban areas, there are land, transportation and congestion constraints. They advocate for expanding curbside collection and modernizing the system.

Materials Acceptance Lists

David Allaway revisited specific comments about particular materials that were received after the January RAC meeting.

Small Format Plastics

DEQ has recommended including plastic bottles and tubs of certain resins that have a volume of six ounces or higher. In comments received from the Consumer Brands Association, DEQ was asked to consider using the Association of Plastic Recyclers design guidelines which use dimensional size-based standard instead. The proposal would align with national standards and would benefit national brands. DEQ would not support the use of the APR size criteria for a list that eventually needs to be communicated to the public.

Another suggestion was also proposed, to lower the volume minimum to 4 ounces, to capture more plastic packaging, such as yogurt cups. However small yogurt cups are often made of polystyrene, which is a material we're not recommending for inclusion in the USCL largely due to end market limitations.

Discussion: DEQ invited the RAC to provide feedback on whether they support 4 or 6 ounces. There was no discussion.

DEQ was asked to provide time for the RAC to walk through the practical steps necessary to recover each of the materials shown on the list provided in the slide, starting with the generator and following it to the end market. The request also asked for the RAC to be given time to discuss seven items on the acceptance list.

i. **Polycoated and aseptic cartons, polycoated paper cups**

DEQ has recommended that polycoated and aseptic cartons and polycoated paper cups be included on the uniform statewide collection list. Cartons are currently accepted in the Portland metro region and no programs in Oregon currently accept paper cups. DEQ believes the investments in generator-facing contamination outreach and education will help address contamination concerns and any contamination that occurs will be recovered at the commingled processing facilities. Permitting requirements will ensure that the facilities remove contamination, and their costs will be recovered through the contamination management fee (ORS 459A.920). Specialized equipment will not be needed, however processing will be

more complex because the screens are designed to sort materials by shape. Flat materials typically go to the paper line, while three-dimensional items move to the container line. A study of five commingled recycling processing facilities in the U.S. showed that most cartons flow through the facilities to the container line. At the advanced facilities, the container line has advanced technologies capable of sorting the cartons, while the less advanced facilities may send them for secondary processing at a facility that is equipped for the required sortation. Either way, permitting and certification requirements ensure that the materials will be sorted. The processor commodity risk fee will compensate for the capital and operating costs associated with this added step.

Discussion: The RAC was invited to provide feedback and ask questions.

- There were questions about whether separation of aseptic cartons will be required.
Response: This is not a requirement. Processing facilities will have three choices to recover the fiber: separate them into a grade 52 bale, send them to a secondary facility to be further sorted, or direct the material to a grade 54 bale if it goes to an end market that can demonstrate it can recover the fiber.
- It would be helpful if the aseptic cartons need to be separated because it would require upgrades that can perform the advanced sortation on the paper line.
Response: It is expected that all commingled processing facilities will install optical sortation on the fiber line. This will be an allowable expense under the commodity risk and processor fee.
- The timing of investments to upgrade facilities needs to be in advance, before the materials enter the system.

ii. Nursery Packaging made of PP or HDPE

Nursery packaging made of HDPE or PP are currently accepted in the Metro region and Bend, including polystyrene. The inclusion of this material on the list will result in an expansion of service in some parts of the state and a reduction in others. There is potential for contamination, but effective implementation of generator-facing education should reduce some of the contamination currently experienced in the Portland metro and Bend areas. There will be no specialized collection needs, but sorting will be more challenging, with larger pots requiring manual removal in the pre-sort area. One of the special challenges with nursery packaging is that it is often colored with carbon black, which most near infrared optical sortation units cannot identify. This will cause more nursery packaging to flow off the container line and from there go to a more advanced processing facility or a mixed plastics reclaimer.

Discussion: The RAC was invited to provide feedback and the general questions included:

- Given the seasonality of use with this material, has this been considered for anticipating staffing needs?
- Is labor an eligible expense under the processor commodity risk fee? Response: yes.
- Several people commented that the inclusion of certain plastics, and the complexity of the list will result in confusion for customers and contamination.

David went through the differences between the remaining items that there was not time to discuss in depth:

iii. Clear Plastic Cups made of PET or PP

Clear plastic cups made of PET or PP are not currently accepted in commingled programs anywhere in Oregon. Both are being proposed for inclusion on the Uniform Statewide Collection List. There is potential for contamination and education efforts will be needed. Commingled recycling processing facilities will be

eligible for compensation from PROs to manage contamination through the contamination management fee. There will be no specialized equipment or challenges for collecting these materials, and during processing, cups will behave similarly to bottles. Optical sorting technology should be able to capture most cups and be directed to the container line. Those that are not initially captured can also be captured at a downstream secondary processor. Widespread investments in optical sortation technology upgrades will help facilities sort these materials, and they will be eligible for compensation through the processor commodity risk fee.

PET clamshells have not been recommended for inclusion on the USCL because of the use of labeling adhesives.

iv. Plastic Buckets, Pails, Storage Containers made of HDPE and PP

DEQ proposes a dual standard where the materials are listed on the PRO depot list and USCL. Local Governments and service providers can set their own sized-based standard based on “if it fits in the cart” and does not jam the cart, it should be collected. If the container or collection vehicles are not able to fit them, they should be upgraded and match so that the materials can flow through the system without getting stuck.

v. Steel and Aluminum Aerosol Packaging

DEQ is proposing to delist the material due to the potential for release and explosion in the MRF or scrapyards where they would be shredded. Steel mills do not want unemptied, unshredded materials.

vi. Pressurized Cylinders

Similar concerns to aerosols, however, no one has proposed to accept pressurized cylinders for commingled collection.

DEQ concluded the updates and invited feedback in the coming weeks.

Next steps and more information

Cheryl Grabham concluded the meeting and reminded everyone that input can be sent to recycling.2023@deq.oregon.gov.

Last thoughts

Two members who sat on the technical workgroup for the materials list, expressed their appreciation for the work and research that went into the rule concepts. They are looking forward to seeing this move forward.

Another member expressed appreciation for the work and asked that DEQ consider convening the last meeting in person.

Translation or other formats

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Attachment 1: RAC Member List

Rulemaking Advisory Committee Meeting in Attendance for all or part of the March 10, 2023	
Name	Organization/Affiliation
Trevor Beltz	Tillamook County Creamery Association
Lindsay Hardy (alternate for Udara Abeysekera Bickett)	The Environment Center
Rosalynn Greene	Metro
Michael McHenry	Pendleton Sanitary Service, Inc.
Kristan Mitchell	Oregon Refuse and Recycling Association
Jeff Murray	EFI Recycling, Inc.
Deveron Musgrave	City of Eugene
Jerry Powell	Resident
Pam Barrows	Food Northwest
Taylor Cass Talbott	Trash for Peace
Lauren Janes	Consumer Brands Association
Michael Burdick	Association of Oregon Counties
John Salvador	Georgia-Pacific Professional
Maria Constantiou	Resource Recovery Alliance
Tim Brownell	Deschutes County
Alex Chan	Circular Materials
Scott Bruun	Oregon Business and Industry