EFI Recycling
4325 N. Commerce St. Portland, OR. 97217
Metro SSR Facility License Application

Document 2 - EFI Metro License Primary Document

Included Documents

Document List

	File Name (Document)	Description
1	EFI Part 1 Standard App Info --	Primary Application Section 1
2	EFI Metro License Primary Document	Application Section 2, Attach A, B and C
3	EFI Facility Mult Tax Lot	EFI Property Location
4	EFI Site Map and Key	EFI Facility layout and key
5	EFI Attachment D Insurance	Required Insurance Documentation
6	EFI Metro PDX LUCS 18-186158-LUC	Metro - City of Portland LUCS
7	EFI Property Use Consent Signed	Property owner consent to current use
8	EFI DEQ Storm water permit 2017-2022	DEQ Storm Water Permit
9	EFI Fire Annual 11.7.17	Current Fire Sprinkler Inspection Report
10	EFI Metro License Signature Page	License Application Signature Page
11	EFI Nuisance Compliant Forms	Nuisance Complaint Form

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Attachments: A Site Plan ---- B Facility Design Plan
License Requirements

(A1) The location of the facility on a tax lot map.
See Attachment 3 Mult Tax Map

(A2) Boundaries of the facility and property including all tax lots.
The two-acre site is located at 4325 N Commerce Street in Portland, Oregon. The approximate site latitude and longitude are N 45° 36' 32" and W 122° 46' 03", respectively. The legal description is R1E, T1N, S20, Willamette Meridian. The site is located in Multnomah County.

(B1) All solid waste facility license applicants must submit a written description of the following:

a) **Facility, building and equipment overview.** Attached map

Materials Received
EFI receives and the following source separated recyclable materials: Various grades of recyclable papers, primarily made up of cardboard and office papers; source separated commercial commingled recyclables; a small volume of source separated plastics and incidental levels of source separated metals.

Facility Capacity
The capacity of the facility is approximately 75,000 tons per year based on current equipment, hours of production, holding capacity, availability of on and off-site storage and marketability of products.

Facility
EFI Recycling, Inc. was established at its' current 2-acre location in a heavy industrial area on Swan Island in 2001 for the purpose of receiving, sorting, baling and marketing source separated recyclable paper products. The warehouse on-site is approximately 26,000 square feet with an attached 6-bay loading dock of approximately 2,800 square feet. The entire work area within the fenced yard is paved. All receiving, processing and loading of material for market or disposal are done within the building, loading dock or fence enclosed yard.
All rain water from within the fenced area of the facility is collected, filtered and dispersed in the bioswale located along the exterior of the building running the full length of the building running parallel to Channel. The rain water collected from the roof of the building is also diverted to the bioswale. EFI holds a stormwater permit with DEQ. The permit is attached.
Other than trailers at the loading dock and drop boxes actively used for containing materials, no rolling stock or trucks are stored or parked at the facility on a regular basis. Employee and visitor parking is in a designated area outside the fence area near the office and there is additional employee parking in leased spaces from the adjacent neighboring business.

Additional Facilities for Staging and Off-Loading

Trucks, drop boxes and some trailers are stored at a lot located at 2223 N. Randolf Ave, Portland, OR 97227. Operations and maintenance are NOT performed at the Randolf site. Additional trailers are stored and staged at 5036 N. Lagoon, Portland, OR. This facility is solely used for staging of trailers to be off-loaded, loaded or moved to market. All trucks operated by EFI are serviced off site by a third party.

Building - Offices

Within the building structure there is an additional 3,000 square feet of offices that house the management and staff of EFI Recycling. There are additional restrooms for employees and visitors within the office area. Operations in the warehouse may be observed from the upstairs offices as well as the maintenance office on the main floor. There is a door from the office on the main floor that allows direct access to the warehouse.

The scale-master is located in the office area near the enclosed yard. The scale-master has a two-way radio to communicate with drivers on the scale. There is a door located in the scale-master office for driver and employee access to and from the enclosed yard as well as the employee parking lot. The building and loading dock are fully sprinklered and the system is inspected as per code. (Attached document 11).

Building Warehouse

Within the warehouse there is a breakroom and restroom for the employees as well as a maintenance area for equipment repair.

EFI receives all loose loads of source separated recyclables in designated areas in the fenced yard. Baled and otherwise contained loads of recyclables are off-loaded at the loading dock.

EFI receives commercial and industrial source-separated recyclables only. The loads are delivered by EFI operated trucks, licensed refuse haulers and on a very limited basis established commercial self-haul trucks. EFI does not receive material delivered by the general public.

Other than trailers at the loading dock and drop boxes actively used for containing materials, no rolling stock or trucks are stored or parked at the facility on a regular basis. Trucks, drop boxes and some trailers are stored at a lot located at 2223 N. Randolf Ave, Portland, OR 97227. No operations nor maintenance are performed at the Randolf site. Additional trailers are stored and staged at 5036 N. Lagoon, Portland, OR 97217. This facility is solely used for staging of trailers to be off-loaded, loaded or moved to market. All trucks operated by EFI are serviced off site by a third party.

b) Facility design and technology.

See attachment 4 Site Map and section C) below.

c) Buildings and major equipment (existing and proposed).

Covered in section B1a above.

The facility consists of a single building of approximately 26,000 square feet and a 6-bay attached and covered loading dock. EFI operates 2 loaders, excavators (with specific attachments to handle recyclables) and several fork lifts. EFI operates a sort system for the purpose of separating

commercial commingled recyclables. EFI operates a baler that has a capacity in access of 6,500 tons per month.

d) **Construction timeline (as applicable).** *N/A*

e) **Types of wastes to be processed.**
EFI only accepts source separated recyclable materials.
Specifically, Commercial Commingled recyclables; separated OCC; various grades of papers; plastics and incidental volumes of metals collected by EFI trucks as well as license refuse haulers primarily from the Metro region.

f) **Residuals management.**
Residuals from our process are either: 1) pulled out at the point of delivery and placed in a bin or drop box; 2) hand pulled from the sort line, dropped into a bunker below and baled, then placed into a drop box; or 3) removed through the screens in our sort system, baled and placed in a drop box. The residuals drop box is normally located near the feed to the sort line. The residuals drop box is transported to an approved Metro facility that is allowed to accept the contents of the drop box.

(1) **All buildings on the property (existing and proposed) and other pertinent information with respect to the operation of the facility, to include:** See Attachment 4 EFI Site Map and Key. Attachment 4 includes the items listed below as well as identifies the areas for load checking, receiving tipping, mixing, processing, reloading, storage for materials, water for fire suppression, traffic flow, equipment layout
   a) scale and scale house location
   b) fencing and gates
   c) access roads
   d) paved areas
   e) vegetative buffer zones and berms
   f) sorting line and other major materials recovery equipment

(2) **All exterior stockpile footprints, material types stored outside, and the maximum height of each exterior material stockpile.**
See Attached 4 Site Map; The following materials are stored outside for short periods of time: OCC; plastics and other non-degradable materials; during the dry times of the year other paper baled paper products may be staged in the yard for shipment the same day. Maximum bale height is 4 bales; the loose OCC pile is not to exceed the height of the post sort belt; the loose commingle pile is not to exceed the roof height of the lowest protruding cover near the commingle pile.

(3) **Identify water sources for fire suppression.**
See Attachment 4 Site Map
The warehouse and loading dock are fully sprinklered and inspected per code. The water source is the City of Portland. The riser room location is specified on the attached map. There are 3 fire hoses within the facility that are connected to the fire suppression system. There are additional retractable water hoses throughout the sort line that are connected to the primary water (independent of the fire system). There is an additional water hose near the baler and outside near the material receiving area and facility entrance.

(4) **Identify on-site traffic flow patterns.**
See attachment 4 Site Map

(5) **Facility signage. Facility signs must:**
a) **display all of the information required by Metro**
b) **be posted at all public entrances to the facility; and**
c) **conform with local government signage regulations.**
EFI will add additional signage as required by Metro prior to January 1, 2019. EFI will present staff with proofs of the art work for signage prior to placing the order for the signs.

(6) **All receiving, processing, reload and storage areas, as applicable, for solid waste, source-separated recyclable materials, recovered materials, product/by-products, waste residuals, exterior stockpiles, hazardous waste, and other materials.**
See attachment 4 Site Map.

(7) **Load checking areas**
Loads are checked in the tipping areas or at the loading dock as designated on the attached facility map. The loads are primarily checked by either the loader operator, facility cleaner, supervisor, however in the event there is a significant issue a manager is involved in decision making regarding the load. Cameras are aimed at the loose receiving areas and record when motion is detected in the area. Cameras operate 24/7. Camera positions are identified on attached map. Loads are received in the distinct areas identified on the attached Site Map: 4) OCC tipping area; 3) Commingle pile; 13) Loading dock

(8) **Storage areas for the temporary containment of prohibited waste that the facility inadvertently receives, while awaiting proper removal or disposal of the prohibited waste. The facility must cover and enclose the containment areas and construct them in a manner to prevent leaking and contamination.**
Contaminated or prohibited waste such as putrescible waste, dry waste, wood waste... that is acceptable for disposal at Metro approved facilities is immediately removed from the tipping area placed in a residual drop box (27) for storage and transportation and normally removed from the facility the same day as received. If material is received late in the day the residual will be hauled the following day. Other wastes (liquids, batteries, e-waste, oils) are stored in in a large walk-in container (30) until they can be transported to the appropriate facility.

(9) **The location of all commercial and residential structures within a one-mile radius of the facility, identified on a map or aerial photograph.**
See: Document 3 Multnomah County Map

5.01-1120 Facility Operating Requirements

Facility Operating Plan

Overview

EFI Recycling was established in 2001 by the Jenkins family and remains under the ownership and management of the Jenkins' family. The facility is located at 4325 N. Commerce St. in Portland, OR. in a heavy industrial zone on Swan Island. The facility is well-situated to accept source separated loads of various recyclable paper products, small volumes of source separated recyclable plastics, a limited amount of metals and a significant amount of source separated commercial commingled recyclables. These materials are delivered by EFI trucks as well as licensed refuse / recycling haulers that collect this material primarily from businesses in Portland and the surrounding four county area. EFI only accept source separated recyclables and does **NOT** accept any loads of wet or dry solid waste. EFI does not accept loads form the general public and accepts a very limited number of self-haul loads from local businesses.
EFI generally operates 24 hours per day 6 days a week. The facility is fully fenced and has a single gate entry for vehicles to enter and exit as well as a walk-through gate near the scale-house. The facility is closed and locked during non-operational hours. All collection vehicles delivering material to EFI are staged on the property (attachment 4 Site Map).All trailers that either deliver recyclables or pick up material for market are shuttled into the facility by either EFI operated trucks or by our yard goat operator. All vehicles delivering or picking up recyclables are scaled in. Hauler route trucks that utilize the facility on a regular basis (nearly all hauler trucks) have an average tare weight held in the system and do not need to scale out. Route trucks and drop boxes tip their material in either the source separated OCC pile or in the Commercial Commingle pile. The loader operator or a supervisor observes the load and determines if the load is acceptable as is. There are cameras focused on key points throughout the yard and inside the building including the receiving areas. The operating procedures are described in more detail throughout the document.

Facility Operations License Requirements

1. <u>Prevent Contamination and Degradation.</u> **A licensee must protect source-separated recyclables from contamination from other solid wastes and not allow source-separated recyclables to degrade due to exposure to elements including sun, wind or rain.**

EFI receives all loose loads of source separated recyclables within the fenced area of the facility. EFI does not intentionally receive any materials others than those previously stated. Nearly all loads delivered to EFI are by either EFI collection vehicles (van trucks, roll-off trucks) or by licensed refuse / recycling haulers. Our customer base is very steady as are the vast majority of loads they deliver. In the event a new load arrives at the facility, it is identified by the scale-master and either a manager or supervisor verifies that the load meets acceptable quality specifications. In the event it does not, the driver and the company contact are notified, and the load will not be accepted in the future unless it is again inspected and meets the agreed specifications. Any contamination received within a load that may degrade the material is immediately removed from the tipping area and placed in the residual drop box. All loose materials are either processed the same day as received or baled and stored for processing at a later time. In the event of extreme weather, material is baled when received and bales are broken with-in the facility and fed onto the sort line.

2. Residuals. **A licensee must keep all processing residual separate from source-separated recyclable materials.**

Residuals (contaminants) received in delivered loads are either: 1) pulled out at the point of delivery by either a front loader, an excavator, or on a limited basis by hand when equipment is not operating in the area. Removed material is then placed in a bin or drop box; or 2) hand pulled from the sort line, dropped into a bunker below and baled, then placed into a drop box; or 3) removed through the screens in our sort system, baled and placed in a drop box. The residuals drop box is normally located near the feed to the sort line. The residuals drop box is transported to an approved Metro facility that is allowed to accept the contents of the drop box. The current over-all residual level of the facility is less than 6%.

3. No disposal. **A licensee may not transfer source-separated recyclable materials to a disposal site unless allowed by Metro. This rule does not apply to the disposal of materials that are considered contaminants by the facility operator or to materials that do not meet curbside program specifications.**

EFI does not dispose of properly prepared source separated program recyclables (other than the contaminants contained within the loads and the materials that may no longer be recyclable due to the contamination) without the written consent of Metro. In the event EFI is unable to market properly prepared program materials, EFI will notify Metro and DEQ and request a concurrence. In addition to the materials listed above, EFI works with various suppliers to recycle various papers and plastics that are not a part of state, regional or local recycling collection programs. The markets for these materials may come and go. In the event we have collected this material for the purpose of recycling and the market abruptly ends, we notify the supplier of the situation and give the supplier the opportunity to take back possession of the material or ask for written permission from the customer to dispose of the material. We notify the disposal site regarding the nature of the material so that it is understood we are not disposing of program materials and that the supplier is aware we are disposing of it. This "non-program" material does not require a concurrence by DEQ previous to disposal.

4. Tipping and Reloading Materials. **A licensee must tip and reload source-separated recyclables on an impervious surface. Tipping and reloading may occur outside on an impervious surface so long as the licensee moves the materials inside a roofed building that is enclosed on three sides. This must occur within 12 hours of tipping or by end of the business day except as permitted in subsection (6).**

All Commercial Commingle and OCC is received within the fenced, paved yard of EFI. All loose OCC delivered is baled the same day as received. Under normal conditions, all loose commingled material received is processed during the same day that it is received. If circumstances do not allow for all of the commingle material to be processed, the commingled material is baled and stored for processing at a later time. In the event of extreme weather, the loose material received is baled within a short time of delivery. The bales of commingle are broken inside the building and fed to the sort line by the interior sort feed.

5. Material Storage. **A licensee must store source-separated recyclable material on an impervious surface within a covered building that is enclosed on three sides except as permitted in subsection (6).**

With the exception of OCC and non-fiber bales all other paper bales are stored within the building, under cover of the loading dock or in storage trailers until such time they can be shipped to market. During dry weather, paper bales may be staged in the yard for shipment the same day. In the event of heavy rain, the storage of OCC bales in the yard is limited and trailer storage is utilized. EFI owns several 48' to 53' trailers for the purpose of storing product in the event the facility storage is at capacity. These trailers are stored at one of two yards. The first yard is located at 5036 N. Lagoon, Portland, OR. The second yard is located at 2223 N. Randolf Ave, Portland, OR 97227. As mentioned earlier, the Lagoon yard is solely used for the purpose of staging and storing trailers, with and without product. The Randolf yard is used solely for the storage of trailers, drop boxes and EFI trucks. EFI trucks are serviced and washed at a third-party service facility.

6. Outdoor Material Storage. **A licensee must manage, contain and remove processed materials and solid waste at sufficient frequency to avoid material degradation, nuisance conditions, vector or bird attraction or harborage, or safety hazards. The following conditions apply to outdoor storage of source-separated or recovered recyclables:**

   a. **The licensee may store such materials outside of a roofed building if the storage complies with local and state fire codes and meets at least one of the following conditions:**

      1. **The material is stored within an enclosed shipping container, enclosed vehicle, securely covered drop box (roll off container), compactor, or other similar secure portable storage container;**
      2. **The material is stored on an impervious surface and securely covered in order to be protected from wind and precipitation; or**
      3. **The material is stored in a manner that prevents material degradation, vectors, litter, odors, fires, or other conditions that may threaten the environment or quality of the material. Metro may require the licensee to modify outdoor storage practices to avoid nuisances, or health, safety, or environmental problems.**

   b. **Exterior stockpiles must be positioned within the footprints of exterior storage areas identified on the facility site plan.**

      See attachment 4 Site Map.

   c. **Materials may not be stockpiled for longer than 180 days. Metro may grant a variance to the 180 day limit if: (i) there is a demonstrated ·need for an exception, and {ii} the stockpiles will not create a nuisance or a health, safety or environmental problem.**

      EFI complies with the rules regarding Outdoor Material Storage. Storage of materials is described throughout this document as well as in Attachment 4 Site Map.

7. Vehicle Maintenance. **A licensee must maintain and operate all vehicles and devices transferring or transporting source-separated recyclables from the facility in a manner that prevents leaking, spilling or blowing of materials on-site or while in transit.**
   All loads received by EFI are required to be tarped or enclosed in sealed containers. This is also true of loads shipped from the facility. The yard cleaners and operators are particularly aware of loads that are not appropriately contained or if equipment is leaking or dripping.

Cleaners and operators are instructed to make their supervisor aware in the event they observe any of the following: trucks losing material due to inefficiency of the tarping system; or observe fluids of any type leaking from the truck or the body of the truck or drop box. The cleaners and when necessary, the operators are responsible for keeping the facility as well as the streets of Lagoon, Commerce and Channel free of debris and spills within a six-block distance of EFI referred to as the "short loop." In the event that debris is observed on these same streets further from the facility by management or others, the cleaner is sent out to pick up the debris on the "long loop." The cleaners are required to pick up all debris observed on the street as well as within a reasonable distance from either side of the street.

8. **Impervious Surface Maintenance. A licensee must maintain and operate all access roads, and all receiving, processing, storage, and reload areas in such a manner as to minimize and mitigate dust, airborne debris, and litter from being generated on-site.**

   (Also addressed in 7 immediately above)

   All employees in the yard and warehouse are responsible for various levels of maintaining a clean and organized facility. Each has their area of responsibilities related to house-keeping. In addition, EFI employs 3 "cleaners". The cleaners are responsible for the detail cleaning of the facility including the yard, warehouse, and the roads used to access and leave the facility. The cleaners primarily utilize various sizes of blowers to control the debris that the loader operators are unable to move with their equipment. One cleaner starts with the first shift. The second starts halfway through the first shift and works half way through the second shift. The third cleaner starts with the second shift. During the overlap of the cleaners, one cleaner is focused inside the facility while the other is focused on the yard, EFI property outside the yard, streets and neighboring properties if and when needed, however at least one time per day at a minimum. This overlap time is when the facility has the most activity of deliveries and exchange of trailers.

9. **Facility Capacity. A licensee may not exceed its designed operational capacity. If a licensee reaches operational capacity, the licensee may not accept additional loads of source-separated recyclables for processing.**

   EFI recently upgrade the sort and equipment and baler utilized by the facility. The estimated capacity of the facility is 75,000 tons per year.

10. **Controlling Dust and Litter. A licensee must minimize and mitigate dust generation, airborne debris and litter, and must prevent their migration beyond property boundaries.**

    Paper dust is an accumulative issue for SSR facilities such as EFI and normally occurs during the sorting and baling process within the building. EFI controls the dust from this process through continuous cleaning of the facility. The areas within the building that are hard to reach are cleaned utilizing ladders or a high-lift during the graveyard shift.
    EFI receives all loose OCC and commingle loads within the fenced yard of the facility near the building. The OCC is baled throughout the day. During the dry months of the year a sprinkler system wets the loose OCC which helps prevent the material from blowing away from the pile.

On dry and/or windy days EFI operates a sprinkler near the entrance gate to control loose paper from blowing out of the yard onto the street or into neighbors' properties. In the event the wind is more excessive the yard cleaner will spray the pile down or run additional sprinklers. During all hours of processing material there is at least one cleaner working at the facility. During the busiest eight hours of the day there are 2 cleaners working at the facility. During that eight-hour period, one cleaner's sole responsibility is maintaining the cleanliness of the yard and periodically performing litter control as needed in the neighbors' facilities and on the main streets that run to and from the EFI facility for a distance of at least six blocks to and from EFI. This also helps to deal with debris that may have fallen from trucks delivering or picking up materials from EFI.

11. Covered Loads. **A licensee must take reasonable steps, including providing signage, to notify and remind persons delivering source-separated recyclables to the facility that all loads must be sufficiently covered to prevent any material from blowing off the load duringtransit.**

All delivered and shipped loads are required to be covered or enclosed. EFI supplier base consists of EFI trucks and licensed refuse / recycling haulers. EFI requires all EFI roll-off truck drivers to tarp all loads and check for liquid leaks from the drop box as well as from the truck. In the event of any leaks the drivers are required to take corrective actions and clean up any spills that may have occurred. All suppliers are required through their hauling licenses to tarp or otherwise contain their loads as to avoid debris blowing from the vehicle or drop box as well as not allow for leaks.

12. Fire prevention. **The licensee must provide fire prevention, protection, and control measures. This includes, but is not limited to, providing an adequate water supply for fire suppression and isolating potential heat sources and/or flammable materials or substances from the processing area.**

All flammable materials are stored in an enclosed container outside the building away from all paper products. As shown on the map, fire suppression (water sources and fire extinguishers are placed in strategic locations throughout the facility (inside and out) ALL employees are trained upon hire in emergency evacuation procedures whether for fire or other emergencies. Facility wide drills are held throughout the year and more frequent drills are held in the operational areas. Supervisors and operators are trained in what to do in the case of small fires, significant fires needles found on the sort line, needle sticks, minor injuries and significant injuries. A manager is made aware in all cases.

Also Addressed in Attachment 4 Site Map:

13. Qualified Operator. **The licensee must provide a qualified operator on-site during all hours of operation to carry out the function required by the license and the operating plan.**

All operators are trained to identify materials that are not acceptable at the facility and the appropriate methods to handle these materials.

a. **The licensee must maintain and make available to Metro for review all records related to the licensee's training of personnel to recognize, properly handle and dispose of prohibited waste.**
Operators are trained in their duties upon hiring. Operators are trained in their specific duties and are only allowed to operate equipment which they have been trained and tested on. In addition, supervisors, operators and cleaners are specifically trained upon hire on the appropriate methods to handle liquid spills as well as appropriate methods of handling and disposing of materials that are not acceptable at the facility. This training is done upon hire as well as on an annual basis through EFI's employee storm water training. Employees are trained to understand that any material other than those described in this document as acceptable are not acceptable and must be appropriately handled and disposed. Facility personnel, as relevant to their job duties and responsibilities, must be familiar with the relevant provisions of the license and the relevant procedures contained within the facility's operating plan.
Personnel will be trained to understand and execute their appropriate responsibilities and procedures as related to the Metro license.

b. **A qualified operator must be an employee or contractor of the licensee with training and authority to reject prohibited loads and properly manage prohibited waste that is inadvertently received.**
Covered above. In addition, if significant amounts of unacceptable material are found in a specific load, the employee observing the load notifies their supervisor as well as the scale-master.
EFI management has arranged with all suppliers, procedures for handling unacceptable material. In the event an unacceptable load is recognized in time, the load is rejected, and the driver takes the load to an appropriate facility. In the event the load has been dumped, the driver is made aware, pictures are taken and the contamination is removed from the load and placed in the residual drop box. The picture(s) are sent to the scale-master and the scale-master electronically attaches the pictures to the scale ticket. A price adjusted is made to the load ticket and the information is sent to the supplier. In the event the same load is a repeat offender, the load is no longer accepted until the supplier can demonstrate that appropriate corrective actions have been taken.

14. <u>Prohibited Waste.</u> **The licensee must not knowingly receive prohibited waste, including but not limited to non-putrescible waste, putrescible waste, hazardous waste and asbestos containing waste.**
These procedures are currently in place and are described throughout the application. There is no incentive for EFI to knowingly accept the materials listed above.

15. <u>Load Checking.</u> **The licensee must visually inspect all loads it receives and reject prohibited loads upon discovery. If prohibited wastes are discovered after such time that the licensee cannot reject the load, the licensee must properly manage and dispose of the prohibited waste.**
Loads are checked in the tipping areas or at the loading dock as designated on attachment 4- Site Map. The loads are primarily checked by either the loader operator, facility cleaner and/or supervisor. In the event there is a significant issue a manager is involved in decision making regarding the load. Cameras are aimed at the loose receiving areas and record when motion is detected in the area. Cameras operate 24/7. Camera positions are identified on the attached site map. Loads are received in the distinct areas identified on the attached map: 4) OCC tipping area;

3) Commingle pile; 13) Loading dock. All loads delivered to the loading dock are delivered by EFI employees.

16. Measurement of Materials. **The licensee must accurately weigh all source-separated recyclable materials when they are received, transferred to market or intra-facility, and transported from the facility. The scale used to weigh all solid waste must be licensed by the state of Oregon (Weights and Measures Act).** All transactions are currently recorded as described.

17. Transaction Records and Reporting. **The licensee must maintain complete and accurate transaction records on the weights and types of all solid waste including source-separated recyclable materials received, recovered, reloaded, removed or disposed from the facility. Records must include those specified in the Metro document: ((Reporting Requirements and Data Standards for Metro Solid Waste Licensees, Franchisees, and Parties to Designated Facility Agreements" and as required in the solid waste license.**

    All inbound and outbound materials are currently tracked as described above utilizing software specifically designed for the recycling industry.

18. **Access Control. The licensee must control access to the facility and prevent unauthorized pedestrian and vehicular traffic and illegal dumping.**

    The facility is fenced, monitored with motion sensitive cameras and a private security company monitors the facility during off hours. Managers have remote access to the facility cameras. The facility operates 24 hours / day, 6 days / week which helps to reduce the potential of unauthorized entry and illegal dumping.

19. Traffic Flow. **The licensee must take reasonable steps to notify and remind persons delivering materials to the facility that vehicles may not park or queue on public streets or roads except under emergency conditions or as allowed by local traffic laws.**
    Nearly all drivers deliver material and pick material on a regular basis. When a new driver interacts with the scale-master or supervisor in the yard, the driver is made aware of the policies and procedures in regard to the use of the public street, and traffic flow patterns through the facility.
    Managers, supervisors, operators and the scale master monitor the queueing of vehicles at the facility. Signage will be updated as per Metro requirements.

20. Water Protection. **The licensee must provide pollution control measures to protect surface and ground waters from contamination. The licensee must operate consistent with an approved DEQ storm water management plan (or equivalent).** EFI currently holds a DEQ permit and operates within the approved storm water management plan. The facility is inspected for compliance with the Plan by the City of Portland on an annual basis.

21. Vector Control. **The licensee must operate the facility in a manner that does not attract nor is conducive to the harborage of rodents, birds, insects, or other vectors capable of transmitting, directly or indirectly, infectious diseases to humans or form one person or animal to another. If vectors are present, the licensee must implement vector control measures.** EFI employs cleaners on all production shifts. An important function of the cleaners' duties is to keep areas clean and free of debris that may

otherwise create an environment conducive to rodents or other vectors. Incidental amounts of materials that may draw vectors are removed as soon as possible. In addition, EFI contracts with Orkin on a bi-weekly basis to service rodent traps. In the event an increase in rodents is observed, additional measures are taken by Orkin to reduce the vectors.

22. Response to Nuisance Complaints. **The licensee must respond in a timely manner to all nuisance complaints (including, but not limited to, blowing debris, fugitive dust or odors, noise, litter, traffic, and vectors), arid must keep a record of those complaints and any action taken to respond to the complaints, including actions to remedy the conditions that caused the complaint.** Depending on the severity of the complaint, lighter complaints are tracked in the Nuisance Complaint Binder by the scale-master. In the event of a more severe complaint, or at the request of the complainant, the complaint is received and tracked by the Director of Operations or a supervisor assigned by the Director of Operations. All complaints are reviewed by the Director of Operations the same day. In the event the complaint is received after normal office hours, the complaint will be reviewed the following business day. The complaint is reviewed by the Director of Operations with the appropriate supervisor who is responsible to take corrective action. All complaints are reviewed by the senior management at the following weekly managers' meeting.
In the event of a significant complaint, the management is immediately made aware of the complaint and appropriate action is taken. Depending upon the severity of the complaint, the appropriate entities will be advised. All complaints are tracked in a complaint log. There is a summary page with all complaints listed for the current and previous year. Each individual complaint is recorded on a complaint form which tracks the detailed information regarding the complaint. The individual complaint form is tied to the summary page by date and complaint title. All detailed complaint forms will be kept in the binder for a minimum of one year from the time of resolution. (See Document 11, EFI Nuisance Complaint Forms)

23. Noise. **The licensee must prevent noise that causes adverse off-site impacts, and to the extent necessary the licensee must meet applicable state and local regulatory standards and land-use regulations.**

Due to the zoning and surrounding types of businesses , to date, EFI had not received any noise complaints.

24. Odor. **The licensee must prevent odors that create off-site impacts or that are detectable off-site.**

Due to the nature of the material received at the facility, with exception, the material does not create offensive odors or fugitive dust of any significance. The odors that may be created are from contamination within a load that is immediately removed from the tipping area and placed in the residual drop box. In the event that the odor is unusually offensive, the residual box will be immediately transported by an EFI roll-off truck to Metro Central and the supplier is charged for the additional hauling and tipping fees.

25. Signage. **The licensee must post signs at all public entrances to the facility that are easily and readily visible, and legible to users of the facility. The signs must conform to local government signage regulations and contain at least the following information:**

a. **Name of the facility**

b. Address of the facility
c. Emergency telephone number for the facility
d. Operating hours during which the facility is open for the receipt of authorized waste
e. Fees and charges if applicable
f. Metro's name and telephone number (503) 234-3000
g. A list of authorized and prohibited wastes
h. Directions not to queue on public roadways
i. Vehicle/ traffic flow information or diagram
j. Covered load requirements

As previously mentioned, EFI will conform to all Metro signage requirements prior to January 1, 2019.

Changes in Ownership. As set forth in Metro Code Section 5.01.120, the licensee must notify Metro within 10 days if the licensee leases, assigns, mortgages, sells, or otherwise transfers control of the license to another person.

In the event EFI were to take any of the actions described above, EFI will notify Metro as described.

Facility Closure

Short-term – Long-term

Short-term Closure

In the event the facility is unable to process material for a number of consecutive days that places the facility beyond its designed capacity the following procedures will be implanted:
Metro and DEQ are informed of the need and nature of the temporary closure as well as the expected length of closure and the plan for the handling of the various materials that would normally be received by the facility.
Suppliers are informed of the temporary suspension of delivery of materials. EFI works with Suppliers to find temporary destinations for their materials.
Loose materials already at the facility are baled as is. Baled material is either stored in trailers, sold to other facilities or shipped to market. In the event the baler is not functional, loose material is topped loaded into open trailers and shipped to other commingle facilities for sorting and / or baling.
All residuals are sent to the appropriate Metro approved facility for proper disposal.
Suppliers are notified when the facility is again able to receive their materials.
In the event of a planned suspension of operations, all effected parties would be notified in advance to allow Suppliers and end markets to develop alternative plans for the flow of the recyclable materials.

Long-term or permanent closure

The process described in Short-term Closure is followed. In addition, affected local solid waste departments are notified. All inventory is sold, suppliers are informed that the facility will no longer accept materials and all recyclables and residuals are removed from the facility and delivered to the appropriate destinations. The estimated additional cost for handling the material in the event of a permanent is less than $10,000.00.

Metro

Environmental Fibers International, Inc. (EFI) Solid Waste Facility License Application

oregonmetro.gov

Solid Waste Facility License Application

Application packet for a new license, license renewals, change of authorization requests, or change in ownership for facilities that:

- Process non-putrescible (dry) waste
- Reload solid waste
- Compost or reload yard debris

Issued June 2016

Metro
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1835

Solid Waste Facility License Application

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

This packet contains an application for a Metro Solid Waste Facility License. You may also want to review the relevant sections of Metro Code. Metro Code Chapter 5.01 identifies which solid waste facilities and activities require a Metro license. You can access the Metro Code via the Metro web site at www.oregonmetro.gov/metro-code.

Metro staff will review an application for completeness within 15 business days of receipt and notify the applicant whether their application is deemed to be complete. If an application is incomplete, Metro will notify the applicant as to what additional information is required.

Application for a new Solid Waste Facility License

An applicant seeking a new Metro Solid Waste Facility License must first attend a pre-application conference before submitting an application. The purpose of the pre-application conference is for Metro to obtain a description of the proposed solid waste facility and provide the applicant with information regarding the applicable requirements for the proposed operation. The conference also provides the applicant with an opportunity to discuss the application process and to identify any potential issues specific to its proposal. An applicant should prepare for the pre-application conference by reviewing application forms and drafting answers before the conference. To schedule a pre-application conference, contact Metro's Solid Waste Compliance and Cleanup Division at 503-797-1835 or via email at SWCC@oregonmetro.gov.

After completing the pre-application conference, an applicant seeking a new license must submit to Metro a completed *Solid Waste Facility License Application* form and provide all additional information as required. Metro will generally approve or deny a new license within 120 days after Metro deems the application to be complete. The fee for filling a license application is $300. See Metro Code Chapter 5.01 for more information regarding the issuance of a license.

Renewal of an Existing License

An applicant seeking to renew an existing license without substantive changes to the current authorization must submit a completed *Solid Waste Facility License Application* form and provide all additional information as required, unless Metro staff directs otherwise. License renewal applications must be submitted not less than 120 days before the current license expires. If a licensee fails to timely submit a renewal application, the licensee's authority to operate may lapse. Additionally, the Chief Operating Officer is not obligated to renew a license earlier than the expiration date of the existing license even if the licensee files a renewal application more than 120 days before the existing license expires. The fee for filing a license renewal application is $300. See Metro Code Chapter 5.01 for more information regarding the renewal of licenses.

Change of Authorization to an Existing License

An applicant seeking a change of authorization for an existing license (other than renewal) must submit to Metro a completed *Solid Waste Facility License Application* form and provide all additional information as required unless Metro staff directs otherwise. The applicant cannot implement the requested change of authorization until Metro approves it in writing. The fee for filing a change of authorization application is $100. See Metro Code Chapter 5.01 for more information regarding changes of authorization for licenses. Metro may require the applicant to apply for a new license if there is a significant change in the types of solid waste accepted or activities performed at a facility.

Transfer of Ownership or Control of an Existing License

An applicant seeking to transfer ownership or control of an existing license must submit to Metro a completed Solid Waste Facility License Application form and provide all additional information as required, unless Metro staff directs otherwise. See Metro Code Chapter 5.01 for more information regarding requirements for the transfer of ownership for a licensed facility.

Solid Waste Facility License Application

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

INSTRUCTIONS

1. Complete Parts 1 and 2 of application.
2. Verify information is accurate and application is complete.
3. Sign page 14 of application.
4. Include application fee payment
5. Submit application and payment to:
   Metro
   Solid Waste Compliance and Cleanup
   600 NE Grand Avenue
   Portland, OR 97232-2736
   Tel: (503) 797-1835
   Fax: (503) 813-7544
   SWCC@oregonmetro.gov

Metro use only
DATE RECEIVED: SEP 12 '18 RCVD
DATE DEEMED COMPLETE BY METRO: SEP 12 2018

PART 1 – Standard License Application Information

1. Type of Application (please check one)	
X	New license Date of Pre-Application Conference: **June 28, 2018**
☐	Renewal of an existing license Solid Waste Facility License Number:
☐	Change of authorization to an existing license (other than a renewal) Please describe the proposed change below in Section 3.
☐	Transfer of ownership or control of an existing license

2. Type of facility (please check one)	
☐	Non-putrescible (dry) waste material recovery facility
☐	Source-separated food waste reload facility
☐	Yard debris reload facility
☐	Other solid waste reload facility
☐	Yard debris composting facility

X **Source Separated – Material Recovery Facility**

Solid Waste Facility License Application

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

3. If seeking a change of authorization to an existing license, please explain the proposed change below (attach additional pages if necessary). Complete all remaining sections of this form as they pertain to the request.
N/A

4. Applicant (Licensee)	
Facility Name:	**EFI Recycling Inc**
Company Name:	**Environmental Fibers International Inc**
Street Address:	**4325 N. Commerce Street**
City/State/Zip:	**Portland, OR 97217**
Mailing Address:	**4325 N. Commerce Street**
City/State/Zip:	**Portland, OR 97217**
Contact Person:	**Jeff Murray**
Phone Number:	**503-737-2100**
Fax Number:	**503-737-2103**
E-mail Address:	**jeffm@efirecycling.com**

Solid Waste Facility License Application

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

5. Applicant's Owner or Parent Company (provide information for all owners)	
Name:	**Steve Jenkins/Scott Jenkins**
Mailing Address:	**4325 N. Commerce Street**
City/State/Zip:	**Portland, OR 97217**
Phone Number:	**503-737-2100**
Fax Number:	**503-737-2103**
E-mail Address:	**stevej@efirecycling.com / scottj@efirecycling.com**

6. Site Operator (if different from Applicant)	
Company Name:	**SAME AS APPLICANT**
Contact Person:	
Street Address:	
Mailing Address:	
City/State/Zip:	
Phone Number:	
Fax Number:	
E-mail Address:	

7. Site Description			
Tax Lot(s):1400	Section:20	Township:1N	Range:1E

8. Land Use		
Present Land Use Zone:	**IG2i**	
Is proposed use permitted outright?	**X** Yes **(Pending LUCS)** If yes, attach a copy of the *Land Use Compatibility Statement* (see Attachment E).	☐ No
Is a conditional use permit necessary for the facility?	☐ Yes If yes, attach a copy of the *Conditional Use Permit*	**X** No
Are there any land use issues presently pending with the site?	☐ Yes If yes, please explain the land use issues below.	**X** No

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503-797-1835

Description of the pending land use issues identified above:	**N/A**	
Are any permits required from the Oregon Department of Environmental Quality (DEQ)?	**X** Yes If yes, please list all DEQ permits below and attach copies with this application (see Attachment G).	☐ No
Listing of all required DEQ permits:	1200-Z Storm Water-see attached	
Are any other local permits or building codes required?	☐ Yes If yes, please list all other required permits below and attach copies with this application (see Attachment H).	**X** No
Listing of other required permits:	**N/A**	

9. Land Owner		
Is the applicant the sole owner of the property on which the facility is located?	☐ Yes	**X** No If no, please complete this section with additional pages if necessary and attach a completed *Property Use Consent Form* (see Attachment F).
Property Owner:	Jenkins Family Real Estate ***Property owner is also business owner***	
Mailing Address:	4325 N. Commerce Street	
City/State/Zip:	Portland, OR 97217	
Phone Number:	503-737-2100	

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

10. Public/Commercial Operations		
Will the facility be open to the public (e.g., non-commercial self-haul customers)?	☐ Yes	X No
Will the facility be open to non-affiliated commercial solid waste collectors?	X Yes	☐ No
Will the facility accept waste from outside the boundary of Metro?	X Yes	☐ No

11. Operating Hours and Traffic Volume			
	Public (non-commercial self-haul)	Commercial Affiliated	Commercial Non-Affiliated
Operating Hours	**N/A**	**4AM-8PM**	**24/7**
Estimated Vehicles Per Day	**N/A**	**15-20**	**40-50**

12. Inbound Waste/Feedstock by Generator
Identify the expected annual tonnage amount of waste/feedstock that the facility will receive and recover from the following types of generators.

Generator	Tons Received	Tons Recovered	Tons Residual
Agricultural:	**N/A**		
Commercial:	**60k to 75K**	**57K to 71K**	**3K to 4K**
Industrial:	**Included above**		
Residential:	**N/A**		
TOTAL TONS:	**60K to 75K**	**57K to 71K**	**3K to 4K**

Solid Waste Facility License Application

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

13. Inbound Waste/Feedstock by Type
Identify the types of waste/feedstock and annual tonnage amounts of each that the applicant expects to receive at the facility. Also, identify how the applicant will manage each waste stream, the expected tip fees that the applicant will be post at the facility, and estimate of typical length of time required to process each waste stream (attach additional pages if necessary).

Waste/Feedstock Type	Accepted at Facility	Expected Annual Tonnage Amount	Type of Activity to be Performed on Waste	Expected Tip Fee (per Ton)	Estimate the maximum and typical lengths of time required to process each day's receipt of each waste/feedstock type
Source-Separated Wood:	☐ Yes ☐ No				
Source-Separated Yard Debris:	☐ Yes ☐ No				
Source-Separated Residential Food Waste Mixed with Yard Debris:	☐ Yes ☐ No				
Source-Separated Commercial and other Food Waste:	☐ Yes ☐ No				
Inerts (e.g., rock, concrete, etc.):	☐ Yes ☐ No				
Non-putrescible (dry) waste:	☐ Yes ☐ No				
Source-Separated Recyclables:	**X** Yes ☐ No	**60k to 75K**	**Sort/Bale**	**Market driven**	**Normally processed same day as received. Otherwise baled and processed later.**
Special Wastes (please specify):	☐ Yes ☐ No				
Petroleum Contaminated Soil:	☐ Yes ☐ No				
Putrescible (wet) waste:	☐ Yes ☐ No				
Other Waste/Feedstocks (please specify):	☐ Yes ☐ No				
Other Waste/Feedstocks (please specify):	☐ Yes ☐ No				

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14. Outbound Waste, Products, and By-Products

List the expected destination and amount of each type of outbound solid waste, products or by-products that the applicant expects to transport from the facility (attach additional pages if necessary). ***Note: Based on an average of 66K of annual sales***

Destination Site (Name and address)	Waste/Product/By-Product Type	*Expected Annual Tonnage*	Purpose of Delivery*
Export Markets	**Paper Products**	**24K**	**Recycling**
NW Paper Mills	**Paper Products**	**35K**	**Recycling**
Domestic markets	**Non-fiber**	**2K**	**Recycling**
Export Markets	**Non-fiber**	**1.5K**	**Recycling**
Metro Approved Facilities	**Residuals / garbage**	**3K to 4K**	**Disposal**

**For example: disposal, recovery, land reclamation, beneficial use, etc*

15. Subcontractors

Provide the name, address and function of all subcontractors involved in the facility operations:

NAME	ADDRESS	FUNCTION
N/A		

Solid Waste Facility License Application

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

The applicant must prominently mark any information that it claims confidential with the mark "CONFIDENTIAL" before submitting the information to Metro. Subject to the limitations and requirements of ORS Chapter 192 (public records law) and other applicable laws, Metro will treat as confidential any information so marked and will make a good faith effort to not disclose that information unless Metro's refusal to disclose the information would be contrary to applicable Oregon law.

Within five days of Metro's receipt of a request for disclosure of information identified by the applicant (or licensee) as confidential, Metro will provide the applicant (or licensee) written notice of the request. The applicant (or licensee) will have three days within which time to respond in writing to the request before Metro determines, at its sole discretion, whether to disclose any requested information. The applicant (or licensee) must pay any costs incurred by Metro as a result of Metro's efforts to remove or redact any confidential information from documents that Metro produces in response to a public records request. These conditions do not limit the use of any information submitted to or reviewed by Metro for regulatory purposes or in any enforcement proceeding. In addition, Metro may share any confidential information with representatives of other governmental agencies provided that, consistent with Oregon law, those representatives agree to continue to treat the information as confidential and make good faith efforts to not disclose the information.

APPLICANT CERTIFICATION
An authorized agent of the applicant must sign this application. Metro will not accept an application without a signature.

I certify that the information contained in this application is true and correct to the best of my knowledge. I agree to notify Metro within 10 days of any change in the information submitted as a part of this application.

SIGNATURE OF AUTHORIZED AGENT 

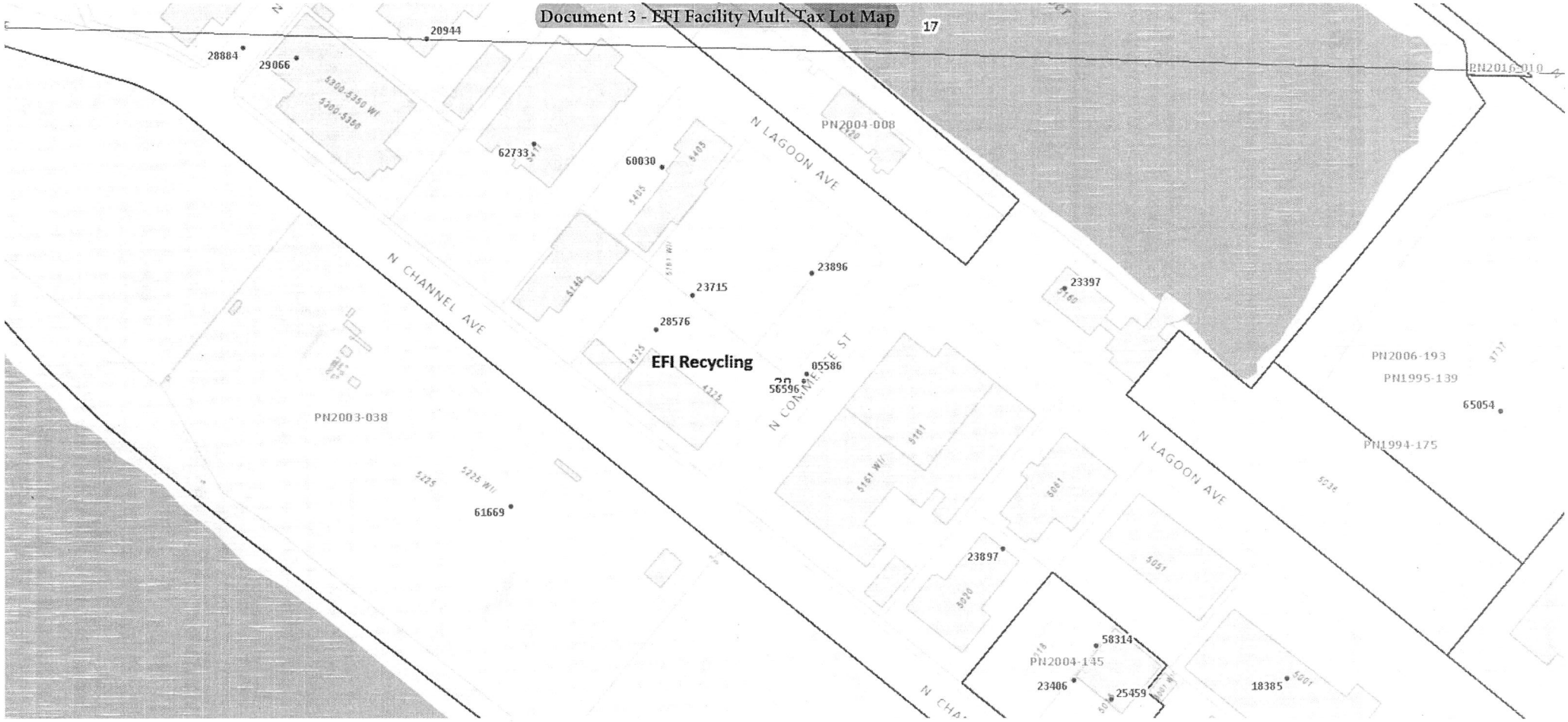
TITLE CEO

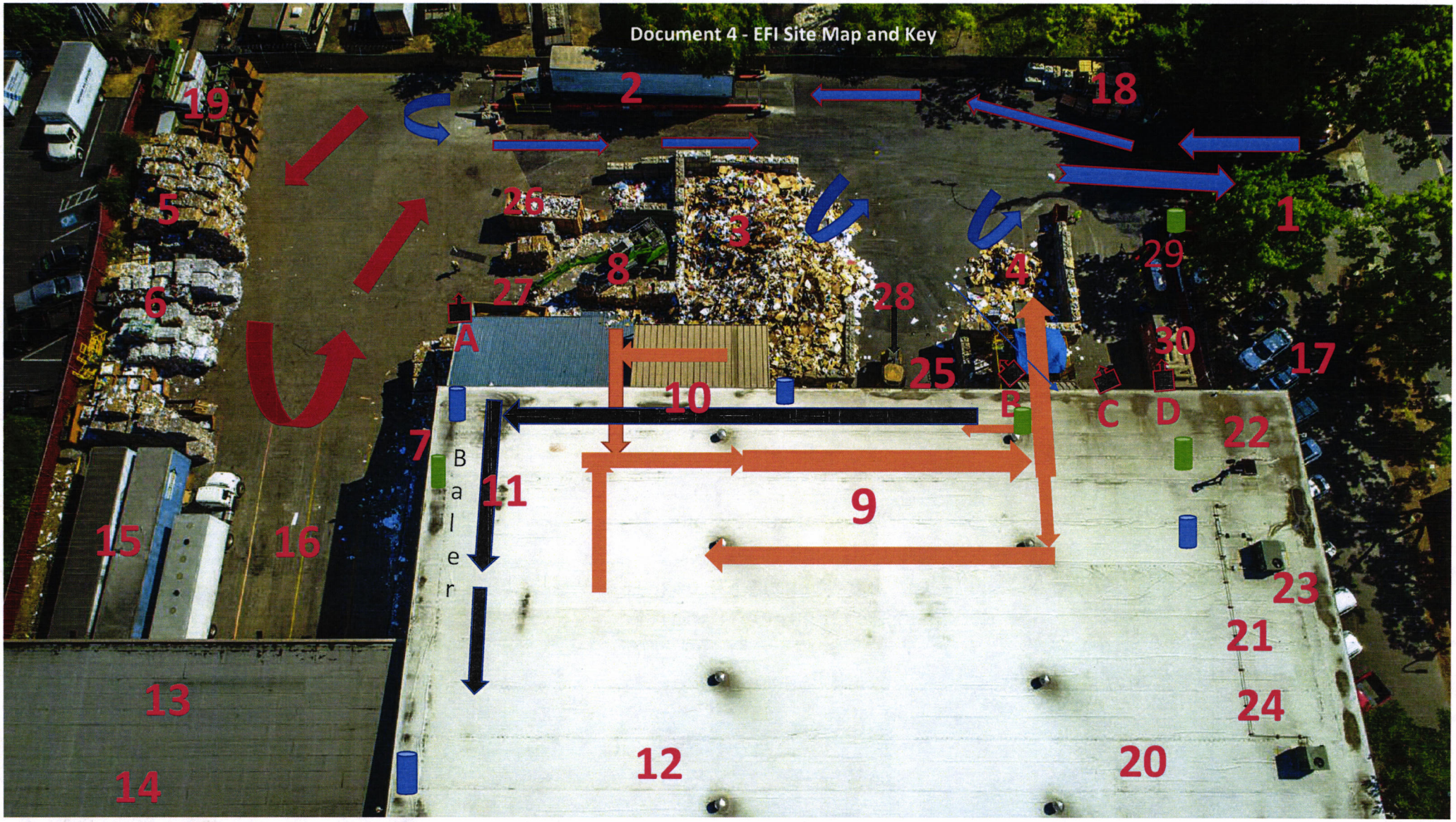
PRINT NAME Scott Jenkins

DATE 8/28/18 PHONE 503-737-2100

EMAIL contact@efirecycling.com

Document 3 - EFI Facility Mult. Tax Lot Map




Document 4 - EFI Site Map and Key
19
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Document 4 - EFI Site Map and Key

Site map key

Vehicle Flow

All vehicles

Loose loads

Trailer – Delivery & Pick-up

Material Flow

Sort line

Baler feed & baler

Exterior cameras

1) Truck entrance & Exit
2) Scale
3) Loose Commingle receiving area
4) Loose OCC Receiving area
5) Short-term bale storage
6) Bale staging for shipping
7) OCC bale storage
8) Outside sort line feed
9) Sort line
10) Baler feed
11) Baler
12) Material storage (loose & baled)
13) Loading dock
14) Loading dock Bale storage
15) Trailers used for Bin storage
16) Trailer staging
17) Parking
18) Pallet Storage
19) Equipment storage
20) Maintenance area
21) Riser room sprinkler system
22) Scale Master
23) General Office
24) Employee break room
25) Baler feed access
26) Drop box for containers
27) Drop box for garbage
28) Loader operator (spotter)
29) Propane Tank
30) Storage Container

Cameras

A) Scale
B) Commingle receiving area
C) OCC Receiving area
D) Facility Entrance

Fire Hoses (Fire System)

Water faucets

Document 5 - EFI Attachment D Insurance

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 7/26/2018

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER: Brown & Brown Northwest 2701 NW Vaughn St, Ste. 340 Portland, OR 97210 www.bbnw.com	CONTACT NAME: Deborah Abbott PHONE (A/C, No, Ext): 503-219-3238 FAX (A/C, No): 503-914-5438 E-MAIL ADDRESS: dabbott@bbnw.com
INSURED Environmental Fibers International, Inc. EFI Recycling 4325 N Commerce Street Portland OR 97217	INSURER(S) AFFORDING COVERAGE — NAIC # INSURER A : State National Insurance Company, Inc — 12831 INSURER B : The American Insurance Company — 21857 INSURER C : SAIF Corporation — 36196 INSURER D : Philadelphia Indemnity Insurance Company — 18058 INSURER E : American Fire and Casualty Company — 24066 INSURER F :

COVERAGES **CERTIFICATE NUMBER:** 43345564 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	✓ COMMERCIAL GENERAL LIABILITY ☐ CLAIMS-MADE ✓ OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: ☐ POLICY ✓ PRO-JECT ☐ LOC ☐ OTHER:	✓		XNDP20245300	5/1/2018	5/1/2019	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG 	$ 1,000,000 $ 100,000 $ 5,000 $ 1,000,000 $ 2,000,000 $ 2,000,000 $
E	AUTOMOBILE LIABILITY ✓ ANY AUTO ☐ OWNED AUTOS ONLY ☐ SCHEDULED AUTOS ✓ HIRED AUTOS ONLY ✓ NON-OWNED AUTOS ONLY			BAA57880784 Includes Hired Auto Physical Damage Comp Deduct 100 Collision Deduct 1,000 Actual Cash Value	5/1/2018	5/1/2019	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) 	$ 1,000,000 $ $ $ $
B	☐ UMBRELLA LIAB ✓ OCCUR ✓ EXCESS LIAB ☐ CLAIMS-MADE ☐ DED ✓ RETENTION $ 10,000			FAE00032256562 Follow form over auto and general liability	5/1/2018	5/1/2019	EACH OCCURRENCE AGGREGATE 	$ 4,000,000 $ 4,000,000 $
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? Y / N: N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	N / A		932604	8/1/2017	8/1/2018	✓ PER STATUTE ☐ OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ 500,000 $ 500,000 $ 500,000
D A	Pollution Liability Rented & Leased Equipment			PHPK1809996 XNDP20245300	5/1/2018 5/1/2018	5/1/2019 5/1/2019	$1,000,000 Each/$1,000,000 Aggregate Limit $100,000, Ded: $1,000	

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Metro, its elected officials, departments, employees and agents are additional insured per attached form CG2010 4/13

CERTIFICATE HOLDER

Metro, Its elected Officials
departments, employees and agents
600 NE Grand Ave
Portland OR 97232

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Deborah Abbott

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THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

ADDITIONAL INSURED – OWNERS, LESSEES OR CONTRACTORS – SCHEDULED PERSON OR ORGANIZATION

This endorsement modifies insurance provided under the following:

COMMERCIAL GENERAL LIABILITY COVERAGE PART

SCHEDULE

Name Of Additional Insured Person(s) Or Organization(s)	Location(s) Of Covered Operations
Metro, , its elected officials, departments, employees and agents **600 NE Grand Ave** **Portland, OR 97232-27136**	
Information required to complete this Schedule, if not shown above, will be shown in the Declarations.	

A. Section II – Who Is An Insured is amended to include as an additional insured the person(s) or organization(s) shown in the Schedule, but only with respect to liability for "bodily injury", "property damage" or "personal and advertising injury" caused, in whole or in part, by:

1. Your acts or omissions; or
2. The acts or omissions of those acting on your behalf;

in the performance of your ongoing operations for the additional insured(s) at the location(s) designated above.

However:

1. The insurance afforded to such additional insured only applies to the extent permitted by law; and
2. If coverage provided to the additional insured is required by a contract or agreement, the insurance afforded to such additional insured will not be broader than that which you are required by the contract or agreement to provide for such additional insured.

B. With respect to the insurance afforded to these additional insureds, the following additional exclusions apply:

This insurance does not apply to "bodily injury" or "property damage" occurring after:

1. All work, including materials, parts or equipment furnished in connection with such work, on the project (other than service, maintenance or repairs) to be performed by or on behalf of the additional insured(s) at the location of the covered operations has been completed; or
2. That portion of "your work" out of which the injury or damage arises has been put to its intended use by any person or organization other than another contractor or subcontractor engaged in performing operations for a principal as a part of the same project.

© Insurance Services Office, Inc., 2012

43345564 | 00168917 | 18-19 MASTER: GL/Auto/XS | Deborah Abbott | 7/26/2018 1:32:44 PM (PDT) | Page 2 of 3
This certificate cancels and supersedes ALL previously issued certificates.

C. With respect to the insurance afforded to these additional insureds, the following is added to **Section III – Limits Of Insurance:**

If coverage provided to the additional insured is required by a contract or agreement, the most we will pay on behalf of the additional insured is the amount of insurance:

1. Required by the contract or agreement; or
2. Available under the applicable Limits of Insurance shown in the Declarations;

whichever is less.

This endorsement shall not increase the applicable Limits of Insurance shown in the Declarations.

© Insurance Services Office, Inc., 2012

43345564 | 00168917 | 18-19 MASTER: GL/Auto/XS | Deborah Abbott | 7/26/2018 1:32:44 PM (PDT) | Page 3 of 3
This certificate cancels and supersedes ALL previously issued certificates.

PR 18-180158 LUCS

Land Use Compatibility Statement (LUCS)

Solid waste application supplemental form

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

SUBMIT THIS FORM TO:
Metro
Solid Waste Compliance and Cleanup
600 NE Grand Avenue
Portland, OR 97232-2736
Tel: (503) 797-1835
Fax: (503) 813-7544
SWCC@oregonmetro.gov

Metro use only
DATE RECEIVED: AUG 29 2018
DATE DEEMED COMPLETE BY METRO: SEP 12 2018

METRO Land Use Compatibility Statement (LUCS)

WHAT IS A LUCS? A Land Use Compatibility Statement is the document that Metro relies on to determine that an application to Metro for a solid waste facility license or franchise is compatible with the applicant's local land use approval.

WHEN IS A LUCS REQUIRED? A completed LUCS should accompany each application for a new Metro solid waste facility license, or franchise and any application for a change of authorization to add new activities to an existing license or franchise.

HOW TO COMPLETE A LUCS: The applicant must fill out Section 1 of the form and then submit the form to the local city or county planning office where Section 2 is completed. The local planning office will determine if the facility meets local land use requirements concerning planning and zoning. The applicant then submits the LUCS to Metro as part of its license or franchise application.

WHERE TO GET HELP: Questions on the Metro LUCS can be directed to Metro Solid Waste Compliance and Cleanup Division staff responsible for processing the Metro license or franchise application at (503) 797-1835.

SECTION 1: To be completed by the applicant:

1. Applicant Information			
Facility Name:	EFI Recycling Inc.		
Company Name:	Environmental Fibers International Inc		
Location Address: **4325 N. Commerce Street** (R315952) **Portland, OR 97217**		**Mailing Address:** **4325 N. Commerce Street** **Portland, OR 97217**	
Contact Person:	Scott Jenkins		
Phone Number:503-737-2100	**Fax Number:503-737-2103**	**E-mail: scottj@efirecycling.com**	

PR 18-186158-LUCS

Land Use Compatibility Statement (LUCS)

Solid waste application supplemental form

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

2. Site Description			
Tax Lot(s): 1400 2.0 acres	Section: 20	Township: 1N	Range: 1E

3. Description of the type of facility, the solid wastes to be accepted and the activities to be undertaken

A. Check all the proposed solid wastes to be accepted in the left column "Proposed waste streams". In the "Activity code" column to the right, insert the letter(s) of all the proposed activities from the list of codes (a-g) corresponding to each waste stream:

Proposed waste streams	Activity code(s)	Proposed activities and codes:
____ Putrescible mixed solid waste (i.e. residential garbage)	_____	a) Material recovery (source separated)
____ Food waste (source separated vegetative or non-vegetative)	_____	b) Material recovery (mixed dry waste)
	_____	c) Composting
____ Yard debris	_____	d) Reload / transfer
____ Wood waste (clean wood waste)	_____	e) Chipping & grinding
____ Wood waste (painted or treated)	_____	f) Other (explain in detail)
____ Non-putrescible mixed solid waste (dry mixed waste)	__a____	g) NA (not applicable)
_X_ Other (clean source separated cardboard, paper & plastics and source separated commercial commingle recyclables)		

B. Description of proposed solid wastes to be accepted and proposed waste-related activities. Please describe in detail the activity you plan to perform on <u>each</u> waste you accept. Add additional pages if necessary.

We accept source separated and source segregated commercial recyclables consisting of cardboard, office paper and some clean plastics. - We grade, bale and market these materials.

We accept Commercial Commingle collected by our own vehicles and licensed haulers. We sort to grade, bale, and market the material.

We do NOT accept solid waste.

4. This land use approval is being sought in conjunction with application to Metro for (check all that apply)

New ■	Amended ☐	License ■	Franchise ☐

PR 18-186158-LUCS

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SECTION 2: To be completed by a city or county planning official:

1. Name of city or county that has land use jurisdiction
Portland Oregon

2. The proposed facility is located (check all that apply)			
X	Inside city limits	X	Inside UGB
	Outside city limits		Outside UGB

PR 18-186158-LUCS

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3. Consistency with local comprehensive plan and zoning ordinance

- ☐ This facility is not regulated by the local comprehensive plan and zoning ordinance.
- ☒ This facility has been reviewed and is consistent with the local comprehensive plan and zoning ordinance. See notes below
- ☐ This facility has been reviewed and **is not** consistent with the local comprehensive plan and zoning ordinance.
- ☐ Consistency of this facility with the local comprehensive plan and zoning ordinance cannot be determined until the following local approval(s) are obtained:
  - ☐ Conditional Use Approval
  - ☐ Development Permit
  - ☐ Plan Amendment
  - ☐ Zone Change
  - ☐ Other _____

An application has been made for the local approvals checked above: **Yes** ☐ **No** ☐

Local Government Planning Official - Reviewer Information:

Signature: SePorsner

Print Name: Suzan Porsner

Title: City Planner

Date: August 29, 2018

Telephone Number: 503-823-5804

E-Mail: suzan.porsner@portlandoregon.gov

The site is zoned IG2.
Industrial Service uses are outright allowed in the IG2 zone.

Property Use Consent

Solid waste application supplemental form

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

SUBMIT THIS FORM TO:
Metro
Solid Waste Compliance and Cleanup
600 NE Grand Avenue
Portland, OR 97232-2736
Tel: (503) 797-1835
Fax: (503)813-7544
SWCC@oregonmetro.gov

Metro use only
DATE RECEIVED: AUG 29 2018
DATE DEEMED COMPLETE BY METRO: SEP 12 2018

Property Use Consent

1. Property Owner.	
Name:	Jenkins Family Real Estate
Mailing Address:	4325 N. Commerce Street
City/State/Zip:	Portland, OR 97217
Phone Number:	503-737-2100

2. Site Description.			
Tax Lot(s):1400	Section:20	Township:1N	Range:1E
Address:4325 N. Commerce Street Portland OR 97217			

3. Describe the applicant's proposed use of this property.
Sort commercial commingle recyclables consisting of cardboard, paper and plastics. Recycle clean source separated cardboard, paper and plastics.

4. Describe the property interest held by the prospective Licensee or Franchisee (Applicant).
Environmental Fibers International Inc. leases the property from Jenkin Family Real Estate.

5. Describe the duration of the interest.
The lease is held in perpetuity to be ended by mutual consent.

Property Use Consent

Solid waste application supplemental form

Metro
600 NE Grand Ave.
Portland, OR 97232
503-797-1835

APPLICANT CERTIFICATION:
An authorized agent of the applicant must sign this form. Metro will not accept a form without a signature.

I certify that the information contained in this form is true and correct to the best of my knowledge. I agree to notify Metro within 10 days of any change in the information submitted as a part of this application.

SIGNATURE OF AUTHORIZED AGENT _____

TITLE CEO

PRINT NAME Scott D. Jenkins

DATE 06/25/18 PHONE 503-737-2100

PROPERTY OWNER(S): This form cannot be processed without a signature.

"I consent to the applicant's proposed use of this property as described on this form. I have also read and agree to be bound by the provisions of Section 5.01 of the Metro Code if the applicant is granted a franchise or license and that franchise or license is subsequently revoked or if renewal of that franchise or license is refused." Metro Code Section 5.01 states: "Upon revocation or refusal to renew the Franchise or License, all rights of the Franchisee or Licensee in the Franchise or License shall immediately be divested."

I certify that the information contained in this form is true and correct to the best of my knowledge. I agree to notify Metro within 10 days of any change in the information submitted as a part of this application.

SIGNATURE _____

PRINT NAME Steve Jenkins

DATE 06/25/18 PHONE _____

SIGNATURE _____

PRINT NAME Dianne Jenkins

DATE 06/25/18 PHONE _____

GENERAL PERMIT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
STORMWATER DISCHARGE PERMIT
Department of Environmental Quality
700 NE Multnomah St., Suite #600 Portland, OR 97232
Telephone: (503) 229-5630 or 1-800-452-4011 toll free in Oregon
Issued pursuant to ORS 468B.050 and the Federal Clean Water Act

ISSUED TO: File # 113286

ENVIRONMENTAL FIBERS INTERNATIONAL, INC.
805 SW Broadway Ste 1900
Portland, OR 97205-3359

Date Issued: August 30, 2017
MULTNOMAH County
EPA# ORR607168
LLID: 1227618456580
River Mile: 8.6630000000000003

Site Location: ENVIRONMENTAL FIBERS INTERNATIONAL, 4325 N COMMERCE ST, PORTLAND

SOURCES COVERED UNDER THIS PERMIT:
A facility that may discharge industrial stormwater to surface waters or to conveyance systems that discharge to surface waters of the state and

1. The stormwater is associated with an industrial activity identified in Table 1: Sources Covered or listed in Table 2: Additional Activities Covered; or
2. The facility is notified in writing by the Director that coverage under this permit is required for its stormwater discharges (see Note 1 below).

Note 1:

1. The Director designates the facility as requiring stormwater permit pursuant to 40 CFR §122.26(a)(9)(i)(D).
2. Facilities may apply for conditional exclusion from the requirement to obtain coverage under this permit if there is no exposure of industrial activities and materials to stormwater pursuant to 40 CFR §122.26(g); see Permit Coverage and Exclusion from Coverage.
3. The following are not eligible to obtain coverage under this permit:
   i. Construction activities; Primary Standard Industrial Classification codes 2951 and 3273, including mobile asphalt and concrete batch plants; and Standard Industrial Classification code 14, Mining and Quarrying of Nonmetallic Minerals, Except Fuels. These activities are covered under a separate general permit.
   ii. Any source that has obtained an individual NPDES permit for the discharge, unless the source is otherwise eligible for coverage under this permit and DEQ has approved the source's application for coverage under this general permit.
   iii. Any source that discharges to a sanitary sewer system and the discharge is approved by the sanitary sewer operator.

Lydia Emer, Administrator
Operations Division

Issuance Date: August 1, 2017

Document 9 - EFI Fire Annual

DELTA FIRE, INC.
14795 S.W. 72nd AVENUE
PORTLAND, OR 97224
PHONE 503-620-4020
FAX 503-620-1058
CCB# 64174

3 YEAR INSPECTION

FIRE SPRINKLER INSPECTION REPORT

REPORT FOR: EFI
INSPECTOR: Marc Bottorff
STREET: 4325 N Commerce St.
DATE: 11/7/17
CITY & STATE: Portland, OR 97217
CERTIFICATION # 5765

1. **General**	YES	N/A	NO
a. Is the building occupied?	X		
b. Is occupancy same as previous inspection?	X		
c. Are all systems in service?	X		
d. Are all fire protection systems same as last inspection?	X		
e. Is building completely sprinkled?	X		
f. Are all new additions and building changes properly protected?		X	
g. Is all stock or storage properly below sprinkler piping?	X		
h. Was property free of fires since last inspection? – Explain any fire on page 2.	X		
i. In areas protected by wet systems, does the building appear to be properly heated in all areas, including blind attics, perimeter areas and are all exterior openings protected against entrance of cold air?	X		
2. **Control Valves** (See Section 16)	YES	N/A	NO
a. Are all sprinkler systems main control valves open?	X		
b. Are all other valves in proper position?	X		
c. Are all control valves in good condition and sealed or supervised?	X		
3. **Water Supplies** (See Section 17)	YES	N/A	NO
Was a water flow test made and tests satisfactory?	X		
4. **Tanks, Pumps, Fire Dept. Connections**	YES	N/A	NO
a. Are fire pumps, gravity tanks, reservoirs, and pressure tanks in good condition and properly maintained?		X	
b. Are fire dept. connections in satisfactory condition, couplings free, caps in place and check valves tight?	X		
5. **Wet Systems** (See Section 18)	YES	N/A	NO
a. Are cold weather valves open or closed as necessary?		X	
b. Have anti-freeze systems been tested and left in satisfactory condition?	X		
c. Are alarm valves, water flow indicators, and retards in satisfactory condition?	X		
6. **Dry Systems** (See Section 14)	YES	N/A	NO
a. Is dry valve in service and in good condition?	X		
b. Is air pressure and priming water level normal?	X		
c. Is air compressor in good condition?	X		
d. Were low points drained during fall and winter inspections?	X		
e. Are Quick Opening Devices in service?		X	
f. Has piping been checked for stoppage within past 10 years?	?		
g. Has piping been check for proper pitch within past 5 years?	?		
h. Have dry valves been trip tested satisfactorily as required?	X		
i. Valve houses and heater condition satisfactory?	X		
7. **Special Systems** (See Sections 15 & 18)	YES	N/A	NO
a. Were valves tested as required?		X	
b. Were all heat responsive systems tested and results satisfactory?		X	
c. Were supervisory features tested and results satisfactory?		X	

DELTA FIRE, INC.
14795 S.W. 72nd AVENUE
PORTLAND, OR 97224
PHONE 503-620-4020
FAX 503-620-1058
CCB# 64174

REPORT FOR: EFI

INSPECTOR: Marc Bottorff

DATE: 11/7/17

8. **Alarms**	YES	N/A	NO
a. Water motor and gong test satisfactorily?	X		
b. Electric alarm test satisfactorily?	X		
c. Supervisory alarm service test satisfactorily?	X		
9. **Sprinklers – Piping**	YES	N/A	NO
a. Are all sprinklers in good condition, not obstructed, and free of corrosion or loading?			X
b. Are all sprinklers less than 50 years old?	X		
c. Are extra sprinklers readily available?	X		
d. Is condition of piping, drain valves, check valves, hangers, pressure gauges, open sprinklers, strainers satisfactory?	X		
e. Are all sprinklers of proper temperature rating?	X		
f. Are portable fire extinguishers in good condition?		X	
g. Is hand hose on sprinkler systems satisfactory?		X	
10. Date System piping last checked for obstruction?	?		
11. Date Dry System piping last check for proper pitch?	?		
12. Date Dry Pipe Valve last trip tested?	9-17-15		

13. Wet Systems: Yes	Number: 1	Make & Model: OS&Y w/ flow switch
14. Dry Systems: Yes	Number: 1	Make & Model: Reliable D
15. Special Systems: Yes	Number: 1	Type: Anti Freeze
Make & Model		Condition: -4

16. **Control Valves**

	Number	Type	Open		Secured		Closed		Sign		Condition
			Yes	No	Yes	No	Yes	No	Yes	No	
City Connection Control Valves	2	OS&Y	x		x			x	x		Good
Tank Control Valves											
Pump Control Valves											
Sectional Control Valves	2	Ball	x		x			x	x		Good
System Control Valves	2	BFV &	x		x			x	x		Good
		OS&Y									

17. **Water Flow Test**

Water Pressure:	x City 97 PSI	Tank ____ PSI	Fire Pump ____ PSI
Water Flow Test:	Yes	(If none made, Why?	

Test Pipe Located	Size Test Pipe	Pressure Before	Flow Pressure	Pressure After	Test Pipe Located	Size Test Pipe	Pressure Before	Flow Pressure	Pressure After
MD	2"	95	90	97					

18. **Heat Responsive Devices:** **Type** **Type of Test**

Valve No.							Valve No.						
Valve No.							Valve No.						
Valve No.							Valve No.						
Valve No.							Valve No.						

Auxiliary Equipment:	Number:	Type:	Location:	Test Results:

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CCB# 64174

REPORT FOR: EFI 11/7/17 **INSPECTOR:** Marc Bottorff

19. Explanation of any "NO" answers indicated previously

Insulation is hanging from roof structure and may block heads

20. Recent changes in building occupancy or fire protection equipment:

21. Adjustments or corrections made:

3 Year Insp. - visual, main drain, bell, switches, full trip, low points,
recharge AF (-4)

22. Recommended Improvements

May need to re-attach insulation to roof structure.

Document 11 Nuisance Complaint Forms

EFI Recycling Nuisance Complaint Form

Open Date	complainant	Company	Received By	Nature of Complaint	Employee in Charge	Closed Date

Document 11 Nuisance Complaint Forms

EFI Recycling Nuisance Complaint Form

Individual Complaint

Complaint Received

Date:_____

Time:_____

Taken By:_____

Complainant: _____

Company: _____

Phone #: _____

Email: _____

Complaint: Circle appropriate item(s)

1) Odor
2) Noise
3) Dust
4) Litter
5) Other _____

Assigned to:_____

Close Date:_____

Summary:_____

_____

_____

Resolution:_____

_____

_____