

Department of Environmental Quality

Northwest Region Portland Office 700 NE Multnomah St Ste 600 Portland, OR 97232-4100 (503) 229-5263 FAX (503) 229-6957 TTY 711

August 13, 2015

Export Global Metals Inc.
Peter Van Houten
General Manager/Vice President of Operations
620 SW Wood Street
Hillsboro, OR 97123

RE: Export Global Metals Inc. Amended Mutual Agreement and Final Order Compliance Inspection

Dear Mr. Van Houten:

On July 13, 2015 the Northwest Region Office of the Oregon Department of Environmental Quality (DEQ) conducted an announced compliance inspection of the operations at the Export Global Metals Inc. (EG) material recovery facility located at 620 SW Wood Street in Hillsboro. EG currently operates under Amended Mutual Agreement and Final Order (MAO), LQ/SW-NWR-14-024, issued by DEQ on June 12, 2015. At the time of inspection, EG was in compliance with the MAO based on DEQ observations. Specifically, the following requirements have been met:

- 1. By 07/01/2015 EG was required to submit a plan to DEQ demonstrating how all processed material will be stored in a building or enclosure within six months of DEQ approval of the plan (MAO, II. 2. a. i.). In compliance, EG submitted a letter to DEQ on 06/30/2015 stating that EG plans to permanently discontinue all shredding operations by 08/01/2015. In an email to DEQ on 08/11/2015 EG confirmed that shredding has been discontinued and all shredding equipment will be removed from the facility by 08/26/2015 and relocated to the EG facility in Carrollton Texas. In the same email EG stated that the 15,000 square foot building previously housing the shredding equipment will be converted to a material storage building that will house all remaining processed material on the site by 09/11/2015. EG states it will revert to its original operation of accepting, aggregating and shipping materials for final processing outside of the state of Oregon (all storage of processed and unprocessed material occurring within the existing building).
- 2. Actions taken (and planned) to comply with 1. (above) may also satisfy II. 2. c. of the MAO requiring that all unprocessed material [other than white goods and other items specifically approved by DEQ for uncovered storage, such as ferrous materials (unprocessed steel and tin), baled plastics, non-ferrous materials that have been fully drained and do not have any liquid wastes such as oil, antifreeze, etc. leaking from them (motors, alternators, starters, stainless steel, aluminum), and wire] be removed from the site or stored in a building or enclosure by 09/30/2015.

With the termination of shredding operations EG is also requesting to withdraw its permit application for a solid waste material recovery facility. DEQ will evaluate future permitting requirements based on observation of operations in upcoming MAO compliance inspections. Based on the dates proposed in the compliance plan provided by EG, DEQ would like to conduct the next MAO compliance inspection on or shortly after 09/11/2015.

If you have any questions or concerns please feel free to contact me by phone at (503) 229-5478, or email at hough.daniel@deq.state.or.us. Your cooperation is appreciated.

Sincerely,

Daniel Hough, REHS

Solid Waste Compliance Specialist

cc: Peter Brandom, City of Hillsboro (<u>Peter.Brandom@hillsboro-oregon.gov</u>) Stacy Hibbard, Clean Water Services (<u>HibbardS@CleanWaterServices.org</u>)

Donald J. Koehler II, Cable Huston LLP (dkoehler@cablehuston.com)

Theresa Koppang, Washington County (Theresa koppang@co.washington.or.us)

Kieran O'Donnell, DEQ Office of Compliance and Enforcement (odonnell.kieran@deq.state.or.us)

Stephanie Rawson, Metro (Stephanie.Rawson@oregonmetro.gov)