Hazardous Waste Enforcement: Oregon Department of Environmental Quality Notice of Civil Penalty Assessment/Order Addressing Millersburg Facility

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The Oregon Department of Environmental Quality ("ODEQ") issued a January 22nd Notice of Civil Penalty Assessment and Order ("Notice") to Highline-Warren, LLC ("HW") for alleged violations of the Resource Conservation and Recovery Act ("RCRA") regulations. See Case No. CASE NO. LQ-HW-WR-2024-630.

The Notice provides that HW operates a manufacturing business in Millersburg, Oregon.

The facility is stated to generate between 220 and 2,200 pounds of hazardous waste on a monthly basis. Further, the facility is stated to not have been issued a permit by ODEQ to treat, store, or dispose of hazardous waste at the facility.

ODEQ staff are stated to have inspected the facility on December 19, 2023.

The Notice alleges the following violations:

- Failure to completely and accurately determine whether residues were hazardous waste upon generation and prior to mixing, dilution, or alteration.
- Failure to label used oil containers with the words "Used Oil."
- Failure to store spent aerosol cans in a compliant container.
- Failure to document the accumulation start date for the storage of spent aerosol cans.
- Failure to comply with requirements for puncturing and draining spent aerosol cans.

The Notice proposes a civl penalty of $11,200.

The Notice provides certain appeal rights.

A copy of the Notice can be found here.