



KITSAP COUNTY BOARD OF COMMISSIONERS

Efficient, accessible and effective county services

November 4, 2024

Christine Rolfes
DISTRICT 1

Charlotte Garrido
DISTRICT 2

Katherine T. Walters
DISTRICT 3

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

**Re: Waste collection services provided by Waste Management of Washington,
Inc. d/b/a Brem-Air Disposal in unincorporated Kitsap County**

Dear Director Killip and Commissioners:

In accordance with RCW 81.77.120, the Kitsap County Board of Commissioners is providing comment on the "perception of the adequacy of service" delivered by Waste Management of Washington, Inc., (WM) operating as Brem-Air Disposal (Brem-Air), under Certificate No. G000237 in unincorporated Kitsap County.

We offer these comments both as customers of Brem-Air and as elected officials representing 286,100 Washington residents, many of whom are Brem-Air customers in the certificated area.

Since our last comment in December 2023, the Solid Waste Division of Kitsap County's Department of Public Works has reported that Brem-Air's services are adequate. However, there are opportunities for continued improvement. Attached is a summary of our staff's observations regarding the current conditions in Kitsap County.

For any follow-up inquiries, please contact Kevin Bevelhimer, Kitsap County Solid Waste Division Senior Manager, at 360-337-4626 or kbevelhi@kitsap.gov. We thank you for the opportunity to provide our input.

Sincerely,

Katherine T. Walters
Chair

Christine Rolfes
Commissioner

Charlotte Garrido
Commissioner

Cc:

Kevin Bevelhimer, Sr. Program Manager, Kitsap County Solid Waste Division
Laura Moser, Public Sector Manager, WM/Brem-Air
Brian Lloyd, District Manager, WM/Brem-Air
John Kiess, Director, Environmental Health, Kitsap Public Health District
Steve Brown, Program Manager, Solid and Hazardous Waste, Kitsap Public Health District

Comment on Services Provided to Kitsap County Solid Waste Transfer Stations

Brem-Air provides drop box services to three Kitsap County solid waste transfer stations that serve 82,923 customers annually. The following comments pertain to these services.

1. **Container dispatch, supply, and quality.** Brem-Air has made improvements in this area. However, we occasionally receive deficient containers or experience hauling delays that necessitate turning away transfer station customers.
 - In 2024 to date, we made 20 requests for solid waste container repair or additional hauling that resulted in customer impacts for eight hours. For recyclable commodities, we made 52 requests for container repair or additional hauling that resulted in customer impacts for fifteen hours.
 - In 2023, we made 18 requests for solid waste container repair or additional hauling that resulted in customer impacts for seven hours. For recyclable commodities, we made 14 requests for container repair or additional hauling that resulted in customer impacts for four hours.
 - In 2022, we submitted 37 container repair requests and turned away customers for 80 hours.
 - In 2021, we submitted 44 container repair requests and turned away customers for 46.5 hours.
 - In 2020, we submitted 39 container repair requests and turned away customers for 80 hours.
2. **Communication.** We commend Brem-Air staff, particularly Brian Lloyd and Matthew Bayne, for their timely and proactive communication with Solid Waste Division operations staff.
3. **Safety.** There were zero Brem-Air vehicle collisions with transfer station infrastructure in 2024 to date.

Comment on Services Provided to Kitsap County Residents and Businesses

The following comments relate to collection services provided to residents and businesses in the certificated area.

1. **Customer service.** In general, we find the customer service provided by the local Brem-Air employees to be good. Their management team appears dedicated to solving customer issues, and they communicate openly with county staff when we bring issues to their attention. However, we have observed that Brem-Air is frequently hindered by regional or corporate WM issues that appear outside of Brem-Air's control.

For example, we frequently receive customer complaints relating to WM's corporate customer service center. Customers report extremely long hold times (in one instance, more than five hours), dropped calls, inoperable "chat" features, unanswered emails, unreturned calls, inadequate or incorrect information, and more. New orders, service changes, and timely cancellations are difficult for both residential and commercial customers.

WM has recently created a new online form for reporting simple residential service issues like missed pickups and damaged carts. While we hope that this form resolves some customer issues, it will not solve them all. We are concerned that WM's national customer service is inadequate for the scale and scope of their national operations.

2. **Construction debris dumpster services.** On 10/27/2023, Kitsap County notified the Commission that WM was improperly charging for construction debris dumpster rental services in Kitsap County. These services, advertised on two corporate WM dumpster rental webpages, implied that the construction debris would be recycled. However, the company disposed of these materials as MSW at Kitsap County's Olympic View Transfer Station.

WM charged higher non-tariff rates for these disposal services, and we believe that many Kitsap County residents and businesses may have been affected.

As of April 2024, the UTC investigation into this issue was still active. Kitsap County requests an update on this investigation.

3. **Materials processing.** Since 2021, Brem-Air has staged commingled recyclables at a private facility outside of Kitsap County before transporting the materials to WM's materials recovery facility in Tacoma. This private facility is not permitted to accept commingled recyclables and, as a result, has experienced regulatory action from Mason County Health District. We are concerned about Brem-Air/WM's practices for selecting materials processors.
4. **Litter.** Brem-Air has been receptive to our concerns about material loss from their vehicles and have taken steps to reduce and clean up litter created by their services. We ask that they continue to be vigilant about this issue.
5. **Spills.** Kitsap County Stormwater Division staff report that Brem-Air is consistently responsive to calls regarding spills and leaks from Brem-Air trucks. Kitsap County staff appreciate the good communication and immediate action taken to resolve issues that arise.
6. **Group collection sites.** Kitsap County and Kitsap Public Health District are concerned about "group collection sites" (GCS) in the certificated area. GCS are sites where Brem-Air services containers from multiple accounts due to conditions deemed "hazardous, unsafe, or dangerous to persons, property, or equipment to operate vehicles due to the conditions of streets, alleys, or roads"

(Tariff 20, Item 30, 4. Refusal of Service). Unfortunately, some Brem-Air customers assigned to GCS are unable or unwilling to transport containers back and forth. They instead use the public right of way for container storage, resulting in public complaints about visual nuisances, litter sources, illegal dumping attractants, and potential traffic hazards.

In 2023, Brem-Air committed to conducting site checks at each of the over 1,300 designated group collection sites in Kitsap County to re-evaluate safety and accessibility.

In 2024, Brem-Air reports that they have eliminated some GCS, prevented the creation of new ones, and have trained their drivers to leave GCS “better than they found them.” We look forward to Brem-Air’s continued work to reduce GCS, and we encourage them to use Limited Access Vehicles to provide convenient curbside collection services to more residents.

7. **Container supply and quality.** We have no concerns about container supply or quality. We look forward to Brem-Air completing its transition to standardized residential carts by December 31, 2025, as required by Kitsap County Code 9.48.
8. **Yard waste collection.** Kitsap County is expanding residential curbside compost collection services in the coming years. We thank Brem-Air for adding additional yard waste routes and assisting Kitsap County with providing marketing and outreach materials for this service. We look forward to our continued collaboration on this multiyear project.