BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper Carrier Classification of GLACIER RECYCLE, LLC; HUNGRY BUZZARD RECOVERY, LLC; AND T&T RECOVERY, INC.	DOCKET NO. TG-072226 DECLARATION OF CALVIN R. PALMER IN SUPPORT OF WASTE MANAGEMENT OF WASHINGTON'S RESPONSE TO MOTIONS FOR SUMMARY DETERMINATION

I, Calvin R. Palmer, declare under penalty of perjury as follows:

1. I am a citizen of the United States and a resident of the State of Washington. I am over eighteen years of age and fully competent to make this declaration. I make this declaration based on my personal knowledge.

2. I am employed by Waste Management, Inc. My present position is Market Area General Manager, Pacific Northwest, and I am responsible for Western Area Landfill Operations.

3. My job involves overseeing and managing three landfills. The Greater Wenatchee Regional Landfill and Recycling Center in East Wenatchee, Washington is a full-service MSW landfill. The Columbia Ridge Landfill and Recycling Center in Arlington, Oregon, has both a full-service MSW landfill and a fully-permitted hazardous waste landfill. The Hillsboro Landfill in Hillsboro, Oregon, is a special waste landfill, accepting nonhazardous and nonputrescible waste. I am also responsible for several transfer stations.

4. In that capacity, I am knowledgeable about day-to-day operations at landfills. I also have extensive experience with siting, permitting, developing and constructing new and expanded landfill facilities.

5. Before working at Waste Management, I was employed by Weyerhaeuser Company, Inc., where I was Director of Integrated Waste Management.

6. One of the primary responsibilities of my job at Weyerhaeuser was the Limited Purpose Landfill and Material Recovery Facility in Cowlitz County, Washington. I was

responsible for siting, permitting, developing and constructing the facility, and after it was built I managed operations.

7. Although the Weyerhaeuser Landfill is not an MSW landfill, it has similar design and operational components. Design components, from bottom to top, are similar and like an MSW landfill, the Weyerhaeuser Landfill has a liner system to prevent groundwater contamination and control methane. It has a leachate collection and control system, to provide for collection and removal of the water or other liquid that becomes contaminated by dissolved or suspended materials due to contact with solid waste or gases. The design includes a run-on/runoff control system to prevent surface water flow onto and the active portion of limited purpose and MSW landfills, and to guard against unpermitted discharges off of the landfill's face. A final closure system is required.

8. Operationally, there is little difference between the Weyerhaeuser Landfill and an MSW Landfill, either. Among the many regulatory obligations, both regularly cover disposed waste to minimize leachate generation and to control disease vectors, fires, nuisance, odors, blowing litter and scavenging. Both kinds of facilities thoroughly compact the solid waste before succeeding layers are added.

9. Operators of any landfill, whether it be limited purpose or full-service MSW, seek to manage the waste disposal practices to achieve optimal compaction and adequate drainage. This is not a regulatory requirement so much as a business objective. The costs for designing, permitting and constructing a new or expanded landfill demand a significant expenditure and capital reserve. The only way to recoup that investment is through disposal fees and otherwise minimize consumption of those expensive infrastructure features. Therefore, airspace is the most valuable asset at any landfill. A universal objective is to maximize waste volumes without sacrificing the ability of the landfill to drain properly. That has been the goal of efficient operations at every landfill I have managed, both during my employment with Waste Management and during my job with Weyerhaeuser Company.

10. The main reason for building the Weyerhaeuser Limited Purpose Landfill and Material Recovery Facility was to dispose of waste generated by Weyerhaeuser's own industrial pulp and paper operations. The Weyerhaeuser Facility was not developed to process waste generated by the households and commercial establishments typically utilized by WUTC haulers.

11. The industrial waste generated internally by Weyerhaeuser Company generally had too high of a moisture content to be disposed of directly into the landfill. It had to be mixed with some other dry materials to achieve proper compaction rates and still maintain adequate drainage.

12. At Weyerhaeuser's Limited Purpose Landfill and Material Recovery Facility, the landfill and material recovery facility each serve different functions, but when we developed the facility the MRF was built as a complement to the landfill so as to maximize transportation and landfill efficiency. The MRF is operated as a staging facility for landfill material for mixing the drier materials with industrial waste to allow for "optimal compaction and adequate drainage."

13. Strategic placement of waste in landfills to achieve the goals of optimal compaction and adequate drainage is a common landfill practice. Managing disposal to minimize airspace and still maintain drainage functions must be taken into consideration by any landfill operator. It was a factor at the Weyerhaeuser Landfill and it is a factor to at all of the Waste Management facilities I oversee.

14. For example, when a load of sewage sludge or dredged sediments is delivered to an MSW landfill operated by Waste Management, measures have to be taken to ensure that the wet material is mixed with other, more dry waste so that it does not create a drainage problem. A responsible landfill operator will spread the sludge out over a landfill lift so it isn't concentrated in one area. The landfill operator will also try to have that wet waste covered with dry refuse to control odors. This is prudent landfill management.

15. Some items delivered to a disposal facility serve positive functions for landfill components. Glass cullet can be used as road bed. Crushed aggregate can be used as a drainage layer in the liner system. At the Weyerhaeuser Landfill, I am aware that shredded tires were

placed in "fingers" to provide internal drainage of water contained within the waste. Contaminated soils are regularly used for daily, interim and final cover.

DATED this 15th day of May, 2008, at Seattle, Washington.

Calvin R. Palmer