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SECTION 2 – FIVE YEAR PLAN

Overview

This section is the "core" of the Plan. It discusses the planning issues introduced in Section 1 in greater depth, and describes what we intend to see accomplished to address these issues between 2008 and 2012 the first five years of this Twenty-Year Plan. (The entire Twenty-Year Plan, which served as the exclusive "menu" for this Five-Year Action Plan, is presented in Section 3.)

This section presents the central planning issues. It details the relationship between the planning issues and the specific activities, which this Plan calls for. It explains the rationale for those activities, and discusses the range of activities, which may be chosen to resolve a problem where a definitive solution cannot currently be selected. Finally, it presents the considerations, which will likely be central to choosing the preferred solution when that solution can eventually be selected.

Following the presentation of each planning issue is a list and description of the activities which will be taken over the next five years to deal with each of these issues. This is the "action plan" to address each issue. The activities and tasks listed in the Five Year Plan are in accordance with the goals from Section 3, the Twenty Year Plan.

This Five-Year Action Plan was developed by analyzing the activities from the Twenty-Year Plan, and selecting those considered to be most effective in resolving the planning issues established earlier in the planning process. While activities shown under a particular issue are meant to address primarily that issue, it is important to remember that in many cases the activities will also help resolve additional planning issues. These additional issues are listed after the activities are described, and fall within the guidelines of the twenty year plan and goals, as described below.

Twenty Year Plan Goals

Goal 1

Reduce, or prevent where possible, the generation of solid and moderate risk wastes and their associated problems to protect human health, safety and environmental quality.

Goal II

To solve problems related to solid waste and moderate risk waste through service oriented, cost effective actions that protect human health and safety and environmental quality.

Goal III

Provide necessary support for the other two system goals.

The system will continue to refine its plans, and develop new ways to accomplish the mission, goals, and sub-goals of this Plan. Some of these efforts will be incremental and ongoing as programs are assessed. While we presently intend for all activities within the Five-Year Plan to be undertaken, future developments may prevent or argue against this. In addition, at any time during the first five-year period covered by this action plan, activities listed in the Twenty-Year Plan may be undertaken instead of the ones listed here. However, if the system desires to undertake activities not listed in the Twenty-Year Plan during the initial five-year planning period, a major plan amendment process would be required. This process would include the involvement of all plan signatory cities and towns as well as Department of Ecology approval.

Other plan modification efforts will be more comprehensive in nature. For instance, the Recycling Potential Assessment (RPA) recognizes that the County's recycling programs need to periodically be evaluated to determine their effectiveness and to identify changes in solid waste management programs that may be appropriate to help achieve waste diversion goals. Such an assessment was conducted in 2003 with the following goals in mind:

1. Document the current state of Whatcom County's recycling programs – what services are provided and who is served;
2. Evaluate existing recycling programs in terms of amount of material recycled or diverted;
3. Document the amount of recyclable materials remaining in the disposed waste stream; and
4. Identify opportunities for increasing recycling and diversion, improving service, and improving program efficiency, while also determining the costs involved.

I - Planning Issues and Considerations

In May of 2003, the Solid Waste Advisory Committee selected three top priority Recycling Potential Assessment (RPA) recommendations for solid waste program and budget development:

- #1 Ranked - Other Residential Opportunities
- #2 Ranked - Technical Assistance & Promotion, Commercial Sector
- #3 Ranked - Curbside Organics Collection

As a result, this Five-Year Plan includes those activities which help address these issues. In some cases activities shown fall neatly into a single planning issue. For instance, when the results of the RPA, along with SWAC's top priority recommendations were presented to the Solid Waste Executive Committee during budget sessions in 2003, a trial Business and Technical Assistance Program was initiated in 2004.

In other cases activities are intended to address a number of planning issues, but will have a primary and direct impact upon a single issue. For instance, the Classroom Education & Outreach Program, will have a primary and direct impact on recycling, but will also help address other issues, including waste prevention, moderate risk waste, and illegal dumping. In such cases, the activity is listed under the issue it will primarily address, but mention is also made of the other affected issues. For some planning issues all of the requisite activities are described elsewhere.

Similarly, certain activities, such as initiation of curbside organics collection will help resolve many of the planning issues. These activities are listed separately below, at the beginning of the issue and program descriptions.

When an activity is implemented to address more than one planning issue it is important for program managers to note that fact. The number of issues to be resolved may affect how the program is implemented, and will affect the results expected from the program. As a result, the program's design needs to be carefully considered. In these cases the programs must be designed and implemented to resolve all of their associated planning issues in order to be successful. It is recognized that while program implementation may affect various issues, the resolution of specific issues may proceed at different timeframes.

Finally, certain activities are basic to the mission of the solid waste management system, and the Public Works Department, in conjunction with the Health Department, is currently following the guidelines of the Hazardous Waste Management Plan and Whatcom County Code to comply with the various regulations dealing with the following:

I.a. Environmental Safety & Compliance

- Moderate Risk Waste Facility Operations
- Leachate and Landfill Gas Operations
- Ground and Surface Water Monitoring
- Moderate Risk Waste Enforcement
- Garbage Accumulation and Illegal Dumping Investigation

Protecting public health, safety, and the environment is the reason that government undertakes solid waste management. The Whatcom County Health Department develops and enforces regulations to ensure this protection, while the Solid Waste Management System develops and implements plans and coordinates solid waste activities. One of the system's most basic solid and moderate risk waste related obligations is to ensure that its facilities, both operating and closed, pose as little environmental danger as is possible. The system commits to fulfilling this obligation and further commits to ensuring that private facilities also pose as little environmental danger as is possible.

I.b Compliance Background

Several federal, state, and local regulations establish requirements for operating, maintaining and monitoring solid waste and moderate risk waste facilities, as well as addressing other

solid waste issues such as illegal dumping and garbage accumulation problems at residences. These regulations are:

I.b.1 Federal:

- Subtitle D, Resource Conservation and Recovery Act (RCRA) . National Pollution Discharge Elimination System (NPDES)

I.b.2 State:

- Revised Code of Washington (RCW). Chapter 36.58, County Solid Waste Disposal. Chapter 70.95, Solid Waste Management, Reduction and Recycling. Chapter 70.95C, Waste Reduction. Chapter 70.951, Used oil Recycling. Chapter 70.95N, Electronic Product Recycling Law. Chapter 70.105, Hazardous Waste Management. Washington Administrative Code (WAC). Chapter 173-303 WAC, Dangerous Waste Regulations. Chapter 173-304 WAC, Solid Waste Handling. Chapter 173-350, Solid Waste Handling Standards. Chapter 173-351 WAC, Municipal Solid Waste Landfills. Chapter 246-203 WAC, General Sanitation

I.b.3 Local:

- Whatcom County Code – Title 8, Health & Safety: 8.10 Solid Waste & Residential Recycling collection; 8.11 Solid Waste Recycling & Collection District; 8.12 Solid Waste Disposal; 8.13 Solid Waste Disposal District; 8.14 Garbage Pass-Through Fee; 8.15 Solid Waste Disposal Sites; Title 24, Health Code: 24.06 Solid Waste Rules & Regulations – Standards & Permits
- Northwest Clean Air Agency Regulations

These regulations establish requirements that govern solid waste storage, handling and facility operating policies, facility closure requirements, ground and surface water protection and monitoring requirements, sanitary sewer, leachate and landfill gas treatment and disposal practices. They also establish requirements, which prohibit illegal dumping of solid and moderate risk wastes, the accumulation of garbage on property, and improper handling of moderate risk waste.

The Whatcom County Health Department is the regulating and enforcement agency for all solid and moderate risk waste facilities, whether operating or closed. The Health Department also investigates and resolves a large number of garbage accumulation, illegal dumping, and moderate risk waste related complaints. Solid waste transfer stations, rural drop box sites, open or altered landfills, certain recycling facilities, and moderate risk waste collection facilities are required to have a permit issued by the Health Department. The Health Department periodically inspects each facility to verify that the Solid Waste Division and other solid waste facility owners are operating their facilities in accordance with applicable regulations.

Moderate risk wastes are, legally, one form of solid waste. Therefore, some regulations which cover solid waste facilities also govern the operation of moderate risk waste facilities. However, facilities for handling moderate risk wastes are also covered by additional

regulations. As is the case with solid waste regulations, federal, state and local jurisdictions all play roles in developing and implementing controlling regulations. Also, as in the case of solid waste, the Whatcom County Health Department is the organization with the bulk of the regulatory duties, and the Solid Waste Division is the primary planning jurisdiction. The two agencies cooperatively implement the Plan. The regulations controlling moderate risk waste facilities, and the organizations which participate in moderate risk waste management, are discussed in detail in the 1991 Moderate Risk Waste Management Plan.

I.c. System Compliance Activities

To ensure compliance with groundwater and surface water regulations the Division's current Contractor performs ground and surface water monitoring at two closed landfills, Cedarville and Y Road.

Following is a brief synopsis of each of the closed landfills:

Cedarville Landfill - This 9 acre landfill opened in 1980 and was closed in 1990. The landfill is estimated to contain 400,000 cubic yards of refuse and cover soil. The facility is being monitored per WAC 173-304 regulations. The facility has a system in place which successfully controls landfill gas migration and odors, as well as a leachate collection system.

Y Road Landfill - The landfill was closed to MSW disposal in 1984, and continued to be a site of limited disposal for CD waste until final closure in 1989. The MSW cells were closed to WAC 173-301 standards in 1984, and the CD waste placed on the cells was later covered and the cells were closed to WAC 173-304 standards.

Samples are collected and sent to a licensed laboratory for analysis for a variety of constituents that would indicate potential problems in both ground and surface water. The results of these tests are provided to the Health Department each quarter. Annually, Whatcom County's Contractor prepares a statistical analysis for each landfill depicting trends in groundwater quality which is forwarded to the Health Department and Department of Ecology for their review.

Landfills generate leachate and methane gas during the decomposition of the waste. When the Cedarville Landfill was permanently closed in 1990, a passive gas collection system with a stack flare was installed. In 2002, gas production had significantly declined to the extent that the flare could not maintain a constant flame, and consequently was decommissioned according to NWCAA standards.

The Cedarville Landfill has a leachate collection system. Leachate generated at the Landfill is collected into a 10,000 gallon tank underneath the landfill through perforated pipes extending into the landfill. Periodically, the leachate is pumped into a tank truck from the landfill through a pumphouse located below the landfill. The leachate is transported to the Ferndale Wastewater Treatment Plant.

Funding for operation and maintenance of all solid waste facilities is included in the annual Solid Waste Division budget. A landfill closure/post closure fund was created for the Cedarville Landfill in 1988 as a result of changes in the State Minimum Functional Standards for

landfills. Sufficient funds were allocated to a reserve account within the Solid Waste fund balance to provide funds for the landfill capping (closure) and to maintain the landfill and perform groundwater monitoring for a minimum of twenty years, or until there is no landfill settlement and leachate and landfill gas production has ceased. At the end of each fiscal year, the post closure reserve account is decreased by the amount of funds expended the previous year. There are no closure funds for the other closed landfills since they were closed prior to the requirement to establish such reserve accounts.

The system is also responsible for two additional closed landfills: Birch Bay and Pt. Roberts. These landfills, closed some years ago, were relatively small and have neither leachate nor gas management systems.

I.d. Facility Monitoring and Remediation

Monitoring closed system landfills is a necessary system responsibility. If monitoring shows cause for concern with environmental quality, remediation of the facility is also an unavoidable division responsibility. As a result, the Solid Waste Division will continue to undertake and place the highest priority on these activities. Any organizational or financial changes which the division undertakes in regards to solid waste management will take into account the vital nature of these activities and their high priority.

I.e. Effective Communications with Other Relevant Parties

Solid waste management has moved from being primarily a local activity to increasingly becoming a regional, statewide, and even national and occasionally international activity. Furthermore, the integration between public and private sectors has also increased, and is likely to continue to do so in the future. As a result of these trends, the division must maintain effective communications with those parties and bodies, such as our own cities and towns, other counties, state Solid Waste Advisory Committee (SWAC), state Solid Waste Policy Forum, National Association of County Officials (NACO), Solid Waste Association of North America (SWANA), Washington State Recycling Association (WSRA), and the North American Hazardous Waste Association (NAHMMA) whose actions will significantly affect the accomplishment of the mission of this Plan.

I.f. Coordination with Other Relevant Parties

In some instances communication will lead to the decision to coordinate activities with others. The system should keep alert for opportunities when coordination will yield more efficient use of resources.

I.g. Monitor Relevant Developments in the State Legislature, Congress, Federal and State Courts, and Administrative Law Panels, and as Appropriate Interact with these Groups and/or Adjust System Policies and Procedures Accordingly

System activities are controlled and impacted by legal forums and political decision makers far removed from the geographic boundaries of Whatcom County. Accordingly, the division will monitor legal and political developments, which may be expected to impact division activities. Where appropriate, the division may participate in these forums and attempt to affect resulting decisions. In instances where such participation is not appropriate or not practical, the system will monitor developments in order to adjust its policies and/or procedures.

I.h. Evaluation Strategy

Wherever feasible, all programs and plans will include an evaluation element. If not feasible, the program will be reviewed annually to determine if it is accomplishing what it was designed to, whether it can accomplish more or accomplish it more efficiently, and whether an evaluation mechanism can be added. Where the activity is being implemented by the division, we will attempt to implement changes suggested by the evaluation process. Where the activity is being implemented by others, the division will work with those parties to seek implementation of the suggested modifications. Furthermore, there will be occasions when the overall direction of activities will be evaluated, such as through the RPA process.

I.i. Data Collection

The collection and analysis of data is necessary for planning and project evaluation. Therefore, the system will undertake extensive data collection and evaluation, including the following activities:

- The division will maintain and analyze data on hauler collected materials, including materials destined for disposal, recycling, and composting.
- Certified Haulers will be required to submit monthly data reports to the system detailing recycling tonnage, participation, rates and other information.
- The division will produce periodic program reports on specific programs.
- The division will cooperate with the Washington State Department of Ecology on the State-wide Recycling Survey and will encourage private companies within Whatcom County to do the same.
- In addition, in an effort to better plan and manage the moderate risk waste facility, data on facility usage, revenues, operation, and costs will be collected and analyzed.

II. Financial Integrity of the System

Whatcom County's Solid Waste Division is funded by the collection of \$8.50 per ton of hauled waste, as well as grant allocations from the Department of Ecology.

II.a. Assess Long Term Financial Needs

As a prerequisite to ensuring the division's financial ability to accomplish mandated and desired activities the system must first determine what those activities are. Long term budgets then have to be developed for these activities. Both elements of this activity will take considerable staff time and will be accorded highest priority.

II.b. Assess Long Term Financial Options

Concurrent with or subsequent to the activity immediately above, Assess Long Term Financial Needs, the options for meeting those needs must be developed. These options' implications will be both statewide and local. Before implementation, they will need to be presented to system decision-makers, the cities and towns, and other stakeholders in the public and private sectors.

III. Ongoing Planning/Public Policy Decision-Making Mechanism

All plans, no matter how well prepared, become outdated. Sometimes plan goals change with time. Circumstances which affect the means by which goals will be attained may also change. If plans are to remain current they must either be rewritten and reapproved constantly, or some means of updating them must be built into the Plan itself.

Accordingly, this Plan attempts to resolve this problem in two ways. First, where the means for resolving a planning issue cannot presently be decided, the Plan instead attempts to show how that decision will be made. The Plan discusses the probable sources of data and other information, the options which currently appear feasible, and the factors which will seemingly have the greatest impact on which solution is chosen. Finally, the Plan discusses who will make the decision.

The second way in which this Plan is designed to stay up to date is that it includes a formal procedure for modifying the plan. In essence, it permits dropping activities shown in the Plan, or undertaking an activity sooner than shown, after notifying DOE and the cities and towns, and having the County Council formally approve the action.

The following programs are designed to address this planning issue and are further described elsewhere in this section.

- Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Whatcom County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.
- Monitor, evaluate, and improve all programs and plans.
- Ensure the long-term financial ability of the system to accomplish mandated and desired activities and to fulfill financial obligations which the division has assumed as a result of its solid waste management, recycling, or moderate risk waste activities.

IV. Moderate Risk Wastes

As discussed in Section 1, the Whatcom County Health Department is, and has historically been, the lead agency for the enforcement of solid waste management issues and works cooperatively with the Department of Ecology for the management of moderate risk waste (MRW) issues in Whatcom County. The Health Department works cooperatively with the division in implementing various programs, including many dealing with MRW.

In regard to household hazardous waste (HHW) activities, the Whatcom County Health Department investigates and resolves complaints involving improper storage and disposal of waste such as oil, gasoline or paint and paint related products. Phone consultation on

household hazardous waste questions has been provided to the public during business hours, with more specific questions being referred to the Disposal of Toxics staff.

The Health Department has also implemented small quantity generator (SQG) activities. (Small quantity generators, SQG's, are businesses that generate and accumulate relatively small amounts of hazardous wastes.) The Health Department has investigated and resolved complaints concerning the mismanagement of small business hazardous waste, and if warranted, referred complaints to the Department of Ecology. Most of these complaints involved improper storage and disposal of waste, as did the HHW complaints; however the SQG complaints generally involved larger quantities of waste.

Following the adoption of the MRW regulations, the Health Department also established a program to permit and inspect MRW collection facilities to ensure that there is no threat to public health created through the operation of these facilities. Since the time the regulations were adopted in 1994, seven MRW collection facilities have been reviewed and permitted, and are currently being monitored. These facilities include both the Ports of Bellingham and Blaine, various auto parts stores around the county, and the system's drop boxes and transfer stations, all of which are considered "MRW" Permitted Facilities. The system's permanent, or "fixed" MRW facility is also permitted by the Health Department.

The Health Department has also implemented a number of miscellaneous MRW activities since the adoption of the 1991 MRW Plan. These include the following: creating an inventory checklist for school chemical stockrooms with information on how to dispose of wastes; doing waste designation for materials that are not suitable for disposal through a solid waste transfer station; and overseeing the proper cleanup of illegal methamphetamine drug labs.

Wherever possible this Comprehensive Solid Waste Management Plan update has attempted to include the progress made to date in implementing the MRW Plan. This Plan also includes other updates to the MRW Plan, such as decisions made and changes in priorities

The 1991 MRW Plan anticipated that an update to that Plan would be prepared in 1999. Since this Comprehensive Plan update coordinates both the system's solid waste and moderate risk waste activities, this Plan should be considered an update to both system Plans. This Plan will be updated no later than 2012, and will continue to include both solid waste and moderate risk waste management. Any prior plans or plan updates remain valid, except as they may conflict with this or future updates.

The following programs are designed to address the moderate risk waste planning issue.

IV.a. Latex Paint

Self-haul, drop-off, and exchange programs are needed for residents, contractors, and other businesses to recycle usable latex paint at a reasonable cost. Previously, the County's MRW facility collected only oil-based paint and solvents, with no provisions for latex paint. While some opportunities were available in the private sector to recycle latex paint, the system looked at other means and opportunities for the exchange and/or recycling of latex paint. As a result of daily requests from customers at the MRW facility, beginning in the Spring of 2007, latex paint has been accepted there for reuse and/or recycle.

IV.b. Household Moderate Risk Waste Recycling/Disposal Opportunities

One significant difference between household moderate risk wastes on one hand, and recyclables and solid wastes on the other, is that a single collector of MRW generally decides whether the waste will ultimately be recycled or disposed of. In the case of solid wastes, the household generator generally separates what is considered to be recyclable from what the generator considers to be solid waste and has the opportunity for curbside pickup of or self-haul to a proper facility.

However, in most cases of household moderate risk wastes, the household disposes of all wastes, and the disposal facility decides whether the material will be disposed of or recycled. The significance of this difference is that the generator of solid wastes must be supplied opportunities for both recycling and disposal, while the generator of household MRW need only be supplied opportunities for "disposal" since the "disposal" facility can be expected to recycle the wastes where it is economically feasible to do so.

The Whatcom County Moderate Risk Waste Management Plan currently assumes that residents should have "free," or low cost opportunities to dispose of their moderate risk wastes. Accordingly, disposal opportunities have been provided to residents, primarily through the fixed facility in Bellingham and at two yearly collection events held around the county. Residents are not charged for this service, the underlying policy being that residents are more likely to remove toxics from their home if they are not charged. However, surveys of residents who use County provided disposal services indicate that there would be little disagreement with a small charge. The issue of charging a fee was discussed at the 2007 meeting of the Solid Waste Executive Committee and a decision was made to continue the free service to Whatcom County residents.

IV.c. Small Quantity Generator Moderate Risk Waste Recycling and Disposal Opportunities

While the division provides residential MRW generators "free" or low cost disposal, policy has generally been that business generators are expected to pay for disposing the MRW they generate. The theory has been that waste disposal is a cost of doing business, and as the division would not subsidize a solid waste generator, so it should not subsidize a moderate risk waste generator. Moreover, Department of Ecology grants, which subsidize household MRW disposal, may not be used for SQG waste disposal. Nevertheless, small quantity generators may bring their MRW to the MRW Facility, where they are able to dispose of this waste for a charge prorated to cover their share of expenses.

IV.d. Moderate Risk Waste Activities Conducted by Whatcom County Health Department

The Whatcom County Health Department is the lead solid waste enforcement agency in Whatcom County, and therefore has the ultimate responsibility for ensuring that moderate risk waste is handled and disposed of in a safe manner, in cooperation with the Department of Ecology. The Health Department currently provides, and will continue to provide, the following services to accomplish this objective:

1. Investigates and resolves moderate risk waste complaints related to businesses and households.
2. Ensures the cleanup of illegal drug labs.
3. Ensures the safe operation of the system's household hazardous waste collection events and its waste oil and antifreeze drop off stations. These sites are reviewed, permitted and inspected.
4. Ensures the safe operation of all other fixed (permanent), temporary, and limited MRW collection facilities. These sites are also reviewed, permitted, and inspected.
5. Provides technical assistance and education to businesses and households regarding hazardous waste prevention, recycling, and proper storage and disposal.
6. Provides technical assistance to public school laboratories regarding appropriate use, storage, and disposal of hazardous chemicals.
7. Provides technical assistance to Whatcom County citizens and public agencies by participating on various committees and providing education at public events.
8. Ensures the availability of self-haul MRW disposal.

IV.e. Opportunities for Residents and Small Quantity Generators

System moderate risk waste activities are designed to minimize the quantity of MRW generated. Nevertheless, some quantity of these wastes will continue to exist, and thus need safe disposal. In contrast to solid wastes, which are generated regularly and by most businesses and households, moderate risk wastes tend to be generated in a scattered and sporadic manner. As a result, regular route collection of these wastes is unlikely to be either safe or economically feasible. Instead, the system has opened a fixed MRW Facility, where safe handling and ultimate disposal of these wastes can be certain. SQG businesses are able to dispose of their MRW at this facility, and are charged for processing and disposal/recycling of this waste.

The MRW Facility is utilized to provide year round disposal of household and SQG wastes, and to maximize opportunities for reuse, recycling, pollution prevention, and education.

The system currently contracts with a private company to operate, handle, transport, and dispose of moderate risk waste brought to the MRW Facility in Bellingham. The operation of this facility allows the system to provide year-round collection services more economically, and also to present opportunities for ongoing educational programs.

Moderate risk waste activities will also help address the waste prevention, content of disposed material, and illegal dumping/other enforcement issues.

Pounds of Household Hazardous Waste Collected from 2000 through 2008:

Year	Residential Customers	SQG Customers*	HHW Collected
2000	3,353	429	250,751
2001	4,368	472	347,982
2002	5,013	425	411,097
2003	5,410	514	428,430
2004	5,689	515	504,962
2005	6,151	596	530,783
2006	5,994	534	476,398
2007	6,902	652	600,519
2008	6,930	764	567,719

***Small Quantity Generator Businesses**

V. Waste Prevention & Reduction

Waste and pollution prevention are the most environmentally beneficial waste management strategies. Nevertheless, they have not engendered the political support or public enthusiasm associated with recycling. While individual companies can achieve considerable economic benefits through waste and pollution prevention, no other company, such as a hauler or processor of recyclables, will gain from another party reducing their generation of waste. This is contrary to the situation of recyclables, where certain companies earn money by helping others to recycle. Since no such profits exist in the case of waste or pollution prevention, the marketing of these strategies will be left largely to the public sector. If the system believes that these strategies are desirable, it must actively and aggressively encourage them.

This Plan assumes that there is, and will continue to be, public support for waste and pollution prevention programs. Therefore it calls for pollution prevention and waste prevention programs for both solid and moderate risk wastes.

The following strategies are designed to address this planning issue:

- Assess needs and educate children, the general public, businesses and institutions, including governmental entities, concerning waste and pollution prevention and recycling.
- Develop and implement programs that will make waste and pollution prevention and recycling easier and more convenient for the general public and businesses and institutions, including governmental entities.
- Assess the desirability and feasibility of legal mandates and public incentives designed to encourage or require waste and pollution prevention and recycling, and implement as appropriate.

- Develop, and where feasible implement, or recommend to the WUTC or other appropriate party, garbage and recycling rate incentives, or other financial incentives, which will encourage waste and pollution prevention and recycling.
- Maintain effective working relationships with haulers and WUTC staff, and comment on proposed WUTC regulatory actions, or otherwise interact with the WUTC where appropriate.
- Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Whatcom County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.

VI. Recycling

The definition of recycling outlined in WAC 173-350, Solid Waste Handling Standards, as adopted by reference in Whatcom County Code 24.06, Solid Waste Rules, states “Recycling means transforming or remanufacturing waste materials into usable marketable materials for use other than landfill disposal or incineration. Recycling does not include collection, compacting, repackaging, and sorting for the purpose of transport.”

This Plan defines "recyclable materials" as those solid wastes that are separated for composting, recycling, or reuse into usable or marketable materials. Materials which are separated, and then used for energy production, such as hogged fuel, would be considered recyclables. Materials disposed of in a landfill or through incineration are not considered recyclable materials, nor are residual material remaining after recyclables have been removed.

To date, designated recyclables include all grades of pulpable paper products; all recyclable metals, both ferrous and non-ferrous, container and window glass; source-separated organic materials such as yard debris, food waste, tree trimmings, wood waste, uncontaminated compostable paper and fiber products that are not readily recyclable through existing pulping processes, and uncontaminated sludges; lubricating and other recyclable oils, tires and other recyclable rubber products; lead-acid and recoverable household batteries; recyclable textiles; plastics such as PET, HDPE, LDPE, and films; chemicals with properties that make them recyclable or reusable, such as antifreeze, inks, latex paint, film developers, and other chemical products and by-products of industrial or commercial processes; gypsum board; polyurethane; electronic waste; asphalt; concrete; treated soils; recyclable CDL; and other materials for which the County determines that viable markets with beneficial uses exist.

The following strategies were identified through the 2003 RPA as those that could potentially increase recycling options for local residents and businesses.

VI.a.1 Residential:

Curbside Organics Collection

- Collection of combined organic wastes, including yard debris, food waste and compostable paper
- Special Materials Collection Events
- Periodic drop off of computers and other electronics

VI.a.2 Commercial:

- Technical Assistance and Promotion
 - Business assistance to help develop waste reduction recommendations, resultant reduced disposal costs, and develop strategies for reaching waste reduction goals
- On-Site Composting
 - Food and other organics at restaurants, schools, food stores and hospitals, and assistance in setting up on-site composting systems
- Organics Collection
 - Automated collection of food and compostable paper waste from restaurants, schools, food stores and hospitals

The following programs will address a variety of recycling issues:

VI.b. School Education Program

The system will provide assistance in the area of hazardous waste and recycling education to schools and other agencies involved with the education of children and older students and encourage parental and community involvement wherever possible. The system provides this service through a contracted service provider; and through this contractor provides educational materials and "hands-on" tools, and provides educational materials directly to teachers when possible.

In discussing the system's responsibilities concerning school programs, the word "school" should be understood broadly. In addition to traditional elementary and secondary schools, the system should also be prepared to provide materials to, and if possible more actively assist, vocational schools and colleges.

VI.c Information Phone Hotline

The system currently provides, and will continue to provide and promote, a central phone number which the public may call for information on solid and moderate risk waste issues. Callers are served by recorded message, office personnel, or specialists depending upon need. In addition, the system will work with other entities, such as the Health Department and Moderate Risk Waste Facility, to ensure that appropriate information is readily available by phone.

VI.d. Educational/Referral Materials

In response to customer needs, the system will continue to maintain, distribute and publish information on private and public solid and moderate risk waste prevention and recyclable management options, including the County Solid Waste website, the State Information

Clearinghouse Solid Waste Information Sharing website, guides, brochures, reference lists, and newsletters.

VI.e. Master Composting/Recycling Program

This program will use classes in Master Composting/Recycling, rain barrel making and community workshops on home composting and gardening to promote the message of reduce, reuse and recycle. The program will partner and collaborate with other organizations and agencies to reach a broad range of residents.

VI.f. Citizen Outreach and Advertising

The system will continue to ensure that current recycling, waste prevention, and MRW handling/disposal instructions are distributed or published to customers annually. Instructions may be distributed by the system or their contractor, other governmental entities, organizations, cities, private haulers, or a combination of these. Instructions may be distributed through direct mail, billing inserts, newspaper ads, city, system, and other organizational newsletters, or, in emptied recycling containers.

VI.g. Optimize Private Sector Efforts

Providing information and advice to existing businesses to expand their activities into locations, sectors, and targeted materials not adequately served at present.

VI.h. Multi-Family Expansion

- Expand the number of multifamily residences with recycling services.
- Educate architects and builders to provide adequate space for recycling.
- Provide an outreach program for multi-family owners, managers and residents.

VI.i. Provide a Business/Technical Assistance Program

Provide local businesses with information and assistance regarding waste reduction and recycling programs. Currently, such programs include the EnviroStars Program, Recycling Hotline, Professional Association Outreach and a Solid Waste funded program to promote reuse and recycling.

VI.j. Promote Residential and Commercial Green Building

Whatcom County, through its Planning and Development Services and funds from the Solid Waste Division will work with local organizations such as the Building Industry Association of Whatcom County and Sustainable Connections to promote residential and commercial green building as recognized in the Washington State Beyond Waste Plan. The County will strive to provide updated and innovative information to local residential home owners and builders that will promote awareness, knowledge and access to green building resources.

VI.k. Washington Electronic Product Recycling Law

RCW 70.95N.030 went into effect July 1, 2006 and requires manufacturers to finance and implement an electronics collection, transportation and recycling program in Washington State. Manufacturer financed programs must be in place January 1, 2009. Products covered under the law include TVs, computers and monitors (RCW 70.95N.020 6) from “covered

entities” defined as any household, charity, school district, small business, or small government. Whatcom County’s roll will be to inform residents, small businesses and schools about this new program through currently existing education methods.

VI.I. Improve In-House Program

The system and cities need to set a good example to other institutions and businesses. Government business should be conducted by promoting a more proactive in-house recycling strategy, including organics, by following green building guidelines, and promoting other waste prevention activities to follow the guidelines of the Washington State Beyond Waste Plan.

Whatcom County is currently in the process of expanding its internal recycling program to include pickup of bottles and cans in each department of the Courthouse. One of the motivating factors for this expansion is that the County is currently seeking LEED (Leadership in Energy and Environmental Design) certification for the Courthouse as an Existing Building. This certification, which is awarded through the US Green Building Council, is based on a number of factors including energy efficiency, indoor air quality, and the ways that materials are purchased and wastes are processed. Achieving this certification will be possible for the Courthouse because of its historical focus on these issues; in fact, improving the recycling program is one of the only changes that are required for certification.

In addition, in early 2007 Whatcom County hired a Conservation Resource Analyst, which is a new position focused on energy and natural resource conservation. This position enables initiatives such as the upcoming Paper Use Reduction Campaign, during which Whatcom County will strive to reduce its internal paper usage by 20% over a two year period.

VI.m. Single Family Residential Curbside Recyclable Collection

Curbside recycling service is legally established, defined, and modified by Whatcom County Code (WCC), section 8.10.050, a copy of which is found in the Appendix of this Plan. The materials that are to be collected for recycling, by haulers within the zone and by other County programs, are also defined by this ordinance.

Source separated recyclables shall be collected from all residences in unincorporated portions of Whatcom County that receive regularly scheduled garbage collection, with the exception of those residences located in Point Roberts, meeting the definition of seasonal vacation or weekend homes who are exempt from curbside recycling collection.

All single-family residences shall be provided with recycling collection at least every other week and on the same day of the week as garbage collection. Residents who have completed the garbage exemption process have the opportunity to subscribe to recycling-only collection.

Haulers shall provide recycling containers to each residence by the customer’s request. The following recyclable materials shall be collected: Newspaper, mixed paper, cardboard, aluminum, foil, tin, glass, plastic bottles, scrap metal, vehicle batteries and motor oil. Yard and food waste collection is available by customer request in specified areas of the county.

VI.n. Residential Multi-Family Recyclable Collection

Curbside recycling service is legally established, defined, and modified by Whatcom County Code (WCC), section 8.10.050, a copy of which is found in the Appendix of this Plan. The materials that are to be collected for recycling, by haulers within the zone and by other County programs, are also defined by this ordinance.

Recycling service, as defined above, shall be provided at least every other week to multi-family residences.

VI.o. Residential Yard Debris Collection

The Solid Waste Division, in cooperation with the City of Bellingham, currently subsidizes a portion of the operation of a "Clean Green" residential yard waste collection site located within the city limits of Bellingham. The site is open on weekends only, March through November, to all residents of the county, and a fee is assessed each load. Optional curbside collection of yard waste is available through private haulers and is offered within the City of Bellingham as well as other small cities and rural areas of the county.

VI.p. Public Residential Recyclable Self-Haul Opportunities

Self-haul (or drop-off) opportunities will be provided at transfer stations and drop boxes for those who self-haul their garbage. The materials accepted will vary depending upon opportunity and circumstance but will include the widest range of materials, including, where practical, MRW, that can be collected within economic and spatial constraints.

VI.q. Private Residential Recyclable and Recyclable MRW Self-Haul Opportunities

Private buyback/recycling centers provide important opportunities to self-haul recyclers. It is important to the County's customers that these centers successfully site and operate in the county. Therefore the system and cities will assist these private activities in the following ways:

1. The system will keep an updated list of properly permitted private drop-off facilities and will make this list available to the public upon request. This list will be used to make phone referrals in response to queries.
2. When possible and appropriate, the system will promote private recycling drop-off facilities in conjunction with other recycling promotional activities.
3. Zoning codes will be reviewed and revised if necessary to ensure that there are reasonable and appropriate opportunities for the establishment of private recycling facilities.

VI.r. Commercial Recycling Collection

Commercial recycling collection is provided by the private sector. Collectors include waste haulers, buyback centers, private collection firms and small "mosquito fleet" operators, often consisting of a single pick-up truck and driver. Businesses and institutions of all sizes throughout Whatcom County are now refining their waste management strategies, and thus

ensuring that they have the opportunity to recycle, rather than dispose of, the wastes they generate.

The system and cities will continue to assist these private collection activities in the following ways:

1. The system will keep an updated list of properly permitted private collection providers and will make this list available to the public upon request. This list will be used to make phone referrals in response to queries.
2. When possible and appropriate, the system will promote private recycling collectors in conjunction with other recycling promotional activities.
3. The system will work with private collection providers to expand and promote services to businesses that currently lack adequate collection opportunities.

As in the case of other self-haul recyclers, private buyback/recycling centers provide important opportunities to commercial self-haul recyclers. The activities above under Private Residential Self-Haul Opportunities, will be implemented with the needs of commercial self-haulers being considered.

VI.s. Construction, Demolition and Land Clearing Debris Recycling

Construction, demolition and land clearing (CDL) recycling is undergoing rapid change, and CDL recycling opportunities are especially critical to contractors and developers. Construction and demolition debris represents a significant component of the county system's waste stream, and these materials will continue to be generated in large quantities so long as Whatcom County's population continues its rapid growth. Restrictions on the burning of these materials are more effective if adequate recycling opportunities exist. Such recycling opportunities do exist currently in Whatcom County, but are continuing to expand and change over time. In addition, local industries are in need of feedstock for manufacturing which is derived from these recyclables. The system and cities will assist private CDL recycling activities in the following ways:

1. The system will keep an updated list of properly permitted private CDL recyclers and will make this list available to the public upon request. This list will be used to make phone referrals in response to queries.
2. When possible and appropriate, the system will promote CDL recycling opportunities in conjunction with other recycling promotional activities.
3. The system will work with private CDL recyclers to expand and promote services to contractors, developers and other interested parties.
4. Zoning codes will be reviewed and revised if necessary to ensure that there are reasonable and appropriate opportunities for the establishment of private recycling facilities.

In addition, the Solid Waste Advisory Committee has suggested that cities, towns, and County government could possibly increase construction and demolition debris recycling in two ways. First, these governments could include, within their own bid requirements, a requirement that any contractor performing work for the government recycle some proportion of the waste produced during the construction project. Second, these governments could include a requirement for recycling within their building or demolition permit requirements.

In addition to recycling, activities will also assist in addressing the following planning issues: content of disposed material, illegal dumping/other enforcement issues and moderate risk waste.

VI.t. Garbage and MRW Service Options

Garbage service options have been established and will continue to be offered which encourage recycling and waste prevention. Whatcom County continues to support universal service of curbside collection of garbage and recycling, according to WCC 8.10 and 8.11. Mini-can or equivalent service will be available to all garbage service customers, and haulers are expected to seek garbage service rate structures, which economically reward recycling and discourage unnecessary garbage disposal. To the degree allowable by the WUTC, rate structures should encourage recycling by providing significant cost differential between various levels of service.

In addition to recycling, activities will also help address the waste prevention, moderate risk waste, illegal dumping/other enforcement issues, and content of disposed material planning issues.

This activity will also assist in resolving the content of disposed material planning issues in addition to recycling issues.

VI.u. Procurement Policies

In keeping with the goals of the Washington State Beyond Waste Plan, Whatcom County will encourage the purchase of products which minimize the unnecessary use of natural resources where feasible. Specification shall be evaluated to discover and eliminate unnecessary barriers to buying or using products containing recycled materials.

The system will provide county, city, and school district purchasing agents with updated information as available. To the degree possible, bid documents should be written such that recycled content materials and recycling opportunities are priced as an option and given preference.

The system will cooperate with other agencies, trade organizations, such as the Washington Organic Recycling Council, and the Industrial Materials Exchange, and private companies to promote the use of recycled content products. When possible, the system will participate in regional "buy recycled" campaigns.

The system and cities will request that bid documents and consultant reports be submitted on recycled content paper and double-sided for waste prevention. The system and cities will encourage haulers and other private recycling service providers to establish and use procurement policies favorable to recycled content materials.

VII. Solid Waste System Capacity

VII.a. Waste Disposal Design

Whatcom County depends upon privately operated disposal facilities for disposal service of MSW. Because of the absence of any County MSW landfill, privately owned disposal facilities will continue to find it necessary to export MSW. These facilities include two transfer stations, Recomp and RDS, and five drop-sites in the county: Birch Bay, Cedarville and Sanitary Service Company (SSC), all operated by SSC; Nooksack Valley Disposal (NVD); and Point Recycling and Refuse. Certificated haulers in the county are SSC, Blaine Bay Refuse, NVD, and Point Recycling and Refuse.

Recycling containers for glass, metals, paper, cardboard and newspapers are located at every transfer station and drop box site. Recycling stations for automotive wastes are located indoors at various automotive supply stores countywide, at our DoT site, and at four permitted satellite stations where waste oil is regularly collected by DoT staff.

Whatcom County owns and operates a permanent fixed disposal facility for the collection of household hazardous waste, the Disposal of Toxics Facility. This facility offers free year-round disposal of household hazardous waste to county residents and is open for a fee to Small Quantity Generator businesses. The facility also offers twice-yearly collection events to rural areas of the county, such as Pt. Roberts and Lummi Island, or other remote locations.

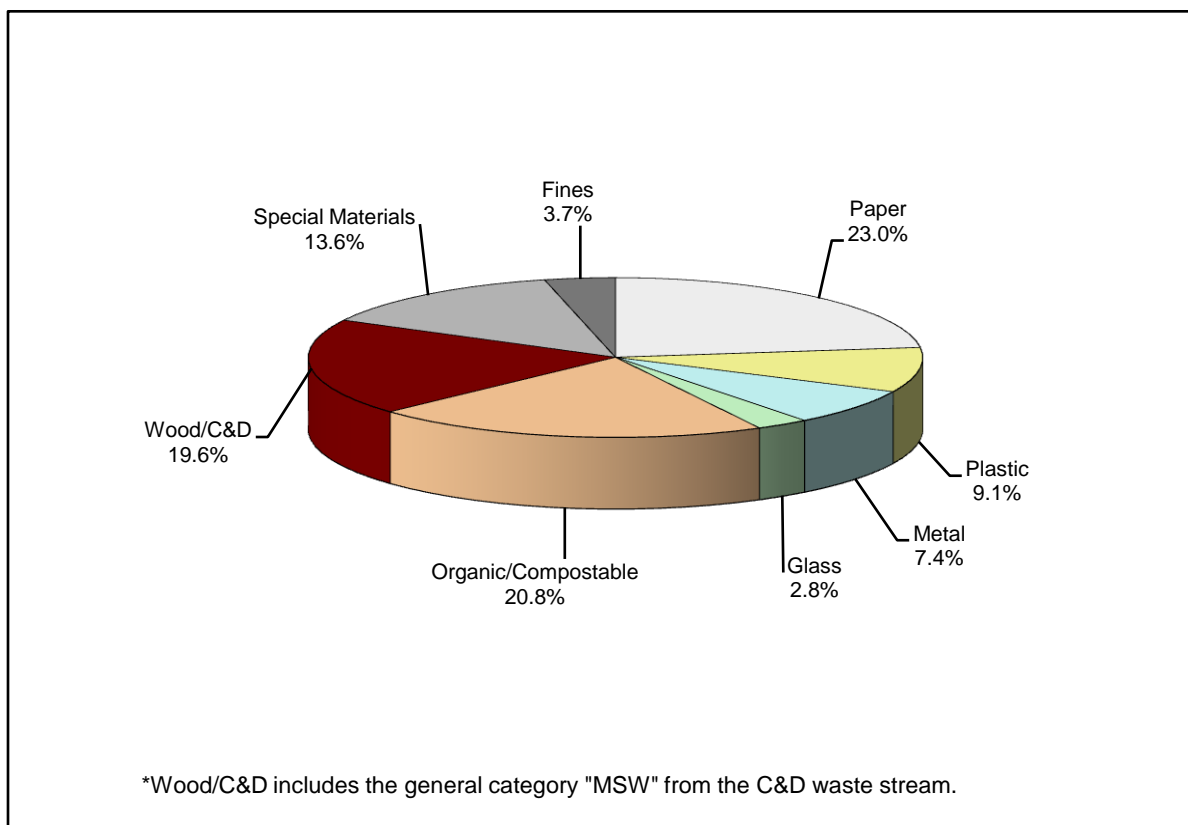
Gross Tons of Municipal Solid Waste from 2000 through 2007:

Year	MSW Gross Tons Disposed*	Population**
2000	90,645	163,500
2001	91,691	170,600
2002	93,782	172,200
2003	98,825	174,500
2004	103,494	177,300
2005	105,428	180,800
2006	111,735	184,300
2007	156,142	188,300

*Yearly gross tons hauled by Sanitary Service Company, Nooksack Valley Disposal, Blaine Bay Refuse and Point Recycling & Refuse

**Figures from WA State Office of Financial Management with actual numbers through 2004 and forecast estimates for 2005 through 2007

VII.b. Composition of Whatcom County Waste



Source: 2003 Whatcom County Recycling Potential Assessment prepared by Cascadia Consulting Group

VII.c. Projected Waste

WASTE DISPOSAL PROJECTIONS

	2004	2012	2017	2022
Population*	182,777	217,426	238,636	261,084
Disposal (tons/year)				
Residential	36,228	43,096	47,300	51,750
Commercial	64,455	76,674	84,154	92,070
Self-hauled	18,448	21,945	24,085	26,351
Construction & Demolition	21,782	25,911	28,438	31,113
Total	140,913	167,625	183,977	201,284

*Source: ECONorthwest
Whatcom County Population and Economic Forecasts

VII.d. Waste Generation Assessment

Waste generation forecasting has and will continue to be an ongoing and vital element of solid waste management planning, and helps to address the waste prevention, recycling and special wastes issues. Waste generation models will be updated periodically and used in conjunction with program and facility planning and evaluation

VIII. Special Wastes

Special wastes are solid wastes that, because of their waste handling characteristics, toxicity or volume, require special handling separate from most other municipal refuse, and include the following:

- Agricultural Waste, including animal carcasses
- Asbestos
- Biosolids
- Contaminated Soil and Dredged Materials
- Grease
- Infectious Waste
- Vector Waste
- Waste Tires

Agricultural Waste

Agricultural waste such as manure and crop residues are returned to the land as soil conditioners. Annual volumes and seasonal variation vary by agricultural sector. Guidelines for the proper handling of livestock waste in western Washington have been published by the Washington State University Agricultural Extension Service and WCC 16.28.010, Manure and Agricultural Nutrient Management. Dead farm animals are disposed of on-site or at rendering plants outside of the County. Current agricultural practices, as they pertain to the County's solid waste management system and health codes, are believed to be adequate and protective of health and the environment.

Asbestos

Asbestos is the name of a group of natural minerals that historically were used in building products such as cement siding, sprayed-on ceiling texture or the paper backing of vinyl floor coverings. It is not considered a hazardous waste under either federal or state regulations, but is regulated under the federal Clean Air Act as an air pollutant that poses human health hazards. Local regulation is provided by the Northwest Clean Air Agency (NWCAA), Regulation Section 570.

Properly packaged and labeled asbestos waste collected at local permitted transfer stations is placed in special containers and transferred to out-of-county landfills for proper disposal, per NWCAA regulations.

Biosolids (Sewage Sludge and Septage)

Sewage sludge that has been treated to meet standards for beneficial use (such as in land application) is called “biosolids.” The type of material is specifically excluded from the definition of solid waste, although other wastes from the wastewater treatment process are still classified as solid wastes. Biosolids are defined by WAC 173-308-080 as “municipal sewage sludge that is a primarily organic, semisolid product resulting from the wastewater treatment process, that can be beneficially recycled and meets all applicable requirements under this chapter. Biosolids includes a material derived from biosolids, and septic tank sludge, also know as septage, that can be beneficially recycled and meets all applicable requirements.” Biosolids are further categorized by federal regulations into Class A and Class B based on pathogen reduction measures and metals contamination levels. The federal regulations are self-implementing, which means that the requirements must be met regardless of the permit status of a facility.

Contaminated Soil and Dredged Material

Contaminated soil is soil removed during the clean up of a hazardous waste site, a dangerous waste facility closure, or from corrective actions or other clean-up activities and which contain harmful substances but are not designated dangerous wastes. Dredged materials come from the dredging of surface waters where contaminants are present at concentrations not suitable for open water disposal, but not designated as dangerous waste.

Contaminated soils can be treated on-site, following Washington State Department of Ecology guidance, or can be treated as solid waste and sent to a permitted solid waste facility.

Dredged materials can be generated when aquatic sediments are removed from open water (i.e., from lakes, rivers or Puget Sound). The dredging activities that generate dredged materials are highly regulated, typically including permits from the U.S. Army Corps of Engineers and additional permits from the other state or federal agencies.

Dredged Materials that are not Solid Wastes:

Washington State Solid Waste Handling Standards (WAC 173-350) specify that certain types of dredged materials are not subject to solid waste regulation. These exempt materials include the following (WAC 173-350-020, 7., 8., and 9.):

- Clean soils and clean dredged materials as defined in WAC 173-350-100
- Dredged materials that are subject to the requirements of a permit issued by the U.S. Army Corps of Engineers under Section 404 of the Water Pollution Control Act, Section 103 of the Marine Protection, Research and Sanctuaries Act, or materials generated during U.S. Army Corps of Engineers Civil Works projects.
- Biosolids that are managed under state biosolids management regulations (WAC 173-308)

Disposal of Non-Exempt contaminated Dredged Materials:

Contaminated dredge materials that are not subject to the above-listed exemptions are solid wastes. These types of materials are typically generated during cleanup actions, navigation dredging in contaminated areas, and other shoreline maintenance projects in contaminated areas. Disposal of these materials is subject to the requirements of WAC 173-350. Unless these materials classify for disposal as “inert waste” (WAC 173-350-990), these materials must be disposed in a permitted solid waste landfill.

There are no existing landfills in Whatcom County that are currently permitted to accept contaminated dredged materials, other than inert waste, for disposal. Generators of contaminated dredged materials who wish to dispose of the materials can either 1) construct and permit a limited purpose landfill (WAC 173-350-400) for that purpose, or 2) use an approved solid waste landfill site located outside of Whatcom County. Existing nearby landfills currently permitted to accept contaminated dredged materials include but are not limited to those located in Wenatchee Washington, Roosevelt Washington, and Arlington Oregon.

Generators of contaminated dredged materials are responsible for determining whether their dredged materials may additionally be subject to the state Dangerous Waste Regulations (WAC 173-303). Waste characterization for that purpose shall be conducted according to the Dangerous Waste Regulations, using generator knowledge and appropriate analytical testing. If dredged materials are determined to be Dangerous Wastes, then these materials must be managed pursuant to WAC 173-303 requirements.

Use of County Waste Management System for Dredged Materials:

Typically, due to cost and logistical considerations, generators of contaminated dredged materials arrange privately for transportation of the materials between the project site where the material was generated and the disposal site located outside of Whatcom County. The Health Department is not directly involved in these projects, provided that the generator and transporter comply with applicable provisions of WAC 173-350.

Use of the County waste management system for disposal of contaminated dredged materials is typically conducted only for small projects (i.e., less than 10 cubic yards). Small project contaminated dredged materials will be accepted into the County System provided that they have been adequately characterized, and provided that they have been dewatered adequately to meet criteria specified under the U.S. EPA paint filter test (see Federal Register, Vol. 50, No. 83, Tuesday, April 30, 1985). Testing requirements shall be appropriate to the project location and the type of material, but shall at a minimum include testing for polycyclic aromatic hydrocarbons (PAHs), and testing by the toxicity characteristic leaching procedure (TCLP) for metals with test methods defined in WAC 173-303. Larger quantities of dredged materials may be accepted in the County system, subject to the written approval of the Health Department. However, generators of larger quantities of contaminated dredged materials are encouraged to make private arrangements for dredged materials transportation and disposal.

Food Related, Non-Petroleum Grease

Grease is generated primarily by restaurants, cafeterias and other food services. Because it is semi-liquid it should not be put into a sewer or septage system, and is not easily handled as solid waste. County residents can properly dispose of grease by taking it to the Disposal of

Toxics Facility. Rendering companies usually handle the collection of grease from businesses, to be recycled into such products as an animal feed supplement or bio-diesel fuel.

If grease is improperly disposed of, several different agencies or companies may deal with it. Grease dumped into sewers should be addressed by municipal wastewater agencies, while grease improperly disposed of in the garbage, would be dealt with by private garbage collectors. Improper handling by restaurants would be handled by the Health Department.

Infectious Waste

Infectious waste is defined in Whatcom County in WCC 24.06.040 as a subset of biomedical waste which poses a risk of infection, including, but not limited to: contaminated laboratory wastes, human surgical specimens, body fluids or blood, medical waste contaminated with excretions, contaminated sharps, and all waste which has commingled or otherwise been contaminated with infectious waste.

These wastes come from medical, dental and intermediate care facilities, research centers, veterinary clinics, funeral homes and other similar facilities and/or persons who may contain pathogens or other biologically active materials in sufficient concentrations that exposure to the waste, directly or indirectly, can create a significant risk of disease.

Handling, storage and disposal of infectious waste in Whatcom County is regulated under WCC 24.06.030 with reference to WAC 173-350, Solid Waste Handling Standards. Enforcement of these regulations is performed by the Whatcom County Health Department.

In general, infectious medical wastes must be categorized, segregated, and packaged separately from other noninfectious waste in containers that are clearly labeled “biohazard” or “infectious waste.” Sharps must be packaged in rigid, impervious containers designed for this purpose. With prior approval of the Health Department, treated infectious solid waste can be disposed of in the solid waste stream.

Vactor Waste

Whatcom County and the City of Bellingham cooperatively maintain a Beneficial Re-Use Facility for the specific intent of providing a place where street sweepings and vactor waste materials collected are processed, therein rendering the material suitable for re-use, recycling, or composting, according to regulatory guidelines. The City of Bellingham has provided the site, maintains and operates it. Whatcom County pays for a proportional share of operations and maintenance.

The smaller cities of the county either deliver their street sweepings and vactor waste to a permitted disposal facility, or take it to a wastewater treatment plant for processing.

Waste Tires

Used tires generated within Whatcom County are generally handled within the retail tire industry. Usable tire casings are either shipped directly to retreading plants or combined with unusable casings for later sorting by processing sites. Unusable tires are shipped by State-permitted tire haulers to approved processing, storage, or disposal sites. Tires disposed of in

the MSW waste stream by individuals and businesses are handled at disposal facilities as any other waste.

Whatcom County's role in managing special wastes

Even more important than the impact of waste disposal on economic development, the system is responsible for the protection of health and environmental quality. Unfortunately, if generators do not have a convenient means of disposing of their waste, some irresponsible generators will be more likely to dispose of their waste illegally. Others may store the waste while they seek disposal. In any case, such storage or dumping is at best unsightly, and at worst involves environmental and health risks.

Managing these risks and preventing associated damages is the most important role the system has in solid waste management. As a result, ensuring that there are disposal opportunities for waste generated in the county will be a high priority system responsibility.

Although these special wastes represent only a relatively small proportion of the total solid waste generated within the county, the Health Department and Solid Waste Management Division receive a significant number of inquiries about a variety of unusual and new wastes. Each of these inquiries represents a customer with a problem. It is the system's responsibility to develop a safe and reasonable disposal option.

The following programs will address this planning issue, and are described elsewhere in this section of the Plan.

- Ensure the operation of solid waste and MRW transfer and processing facilities, including those operated by the private sector, sufficient to handle wastes generated within the county in an environmentally safe and economical manner.
- Assess existing and projected waste generation patterns, including the generation of moderate risk and special wastes, and waste prevention and recycling trends, to determine future program, transfer, processing, and transport needs.
- Assess the ability of the County to meet existing and future needs for the MRW facility, as well as private collection facilities.

IX. Illegal Dumping/Other Enforcement Issues

Illegal dumping is the disposal or handling of waste in a location not permitted for that activity. In some instances this activity will threaten human health or environmental quality, and in other situations it will primarily be more of a nuisance to the owner of the land or adjacent owners. In most situations in Whatcom County current levels of solid waste illegal dumping and unsafe storage practices are not significant health or environmental threats. This is contrary to similar situations involving moderate risk and hazardous wastes, where such practices constitute significant threats.

Despite not being generally dangerous, solid waste illegal dumping and improper storage are localized problems in the county where found. Both are aesthetically displeasing, can reduce real estate values, and represent unwanted costs to property owners. In addition, the improper storage of solid waste can pose local health problems for the offending property owner as well

as those living close by. For these reasons this plan assumes the Whatcom County Health Department and the system will address illegal dumping and other enforcement issues.

The work of the system affects the work of the Health Department. The system seeks to minimize illegal dumping and its impacts through advertising campaigns and grant programs. Conversely, actions of the system can unintentionally increase illegal dumping. For instance, when tip fees rise the Health Department notices increases in illegal dumping and illegal and unsafe solid waste storage practices.

The following strategies are designed to address this planning issue.

IX.a. Define and Undertake the System's Role in Dealing with Illegal Dumping, and Work with Other County, State and Federal Agencies, and Other jurisdictions, to Establish the Roles of These Other Parties.

- The Health Department, in conjunction with the Solid Waste Division, plays an active role in combating illegal dumping. At times, the responsibilities and roles of other parties are somewhat unclear, and there needs to be a coordinated approach to the problem. As a possible solution, the system will work with others to define roles and activities.

IX.b. Educate Those Who Illegally Dump Solid and Moderate Risk Wastes as Well as Landowners Who Suffer Illegal Dumping and Could Secure Their Land to Reduce the Problem.

- While an educational effort will not eradicate illegal dumping, education can reduce the problem. Educational activities will be developed and implemented in conjunction with other parties, as identified by the activity immediately above. These activities will include public education on special waste alternatives, and problems caused by and the possible legal penalties associated with illegal dumping. Other elements will include educating landowners on how to secure their land so as to discourage illegal dumping.

IX.c. Provide Financial Assistance to Those Citizens and Citizen Groups Who Voluntarily Undertake Cleanup of Lands They Do Not Own, to Certain Landowners Who Have Had Waste Illegally Dumped Upon Their Lands, and to Certain Cities, Towns and Community Groups Which Have Community Cleanups.

- The system has developed a program to partially or totally reimburse the solid waste disposal costs of individuals and groups who must dispose of waste they did not generate. In certain cases these are innocent landowners, who permit their land to be used for public recreation, and in other cases they are public service groups which

clean up public lands. The system will continue this program and seek ways to increase its effectiveness.

X. Content of Disposed Material

Many of the programs undertaken by the system are designed to alter the content of waste which generators dispose of. Both waste prevention and recycling programs are designed to alter the quantity and variety of wastes.

While these programs have shown considerable progress, waste from Whatcom County generators still contains useful items and materials which could be easily recycled. The Recycling Potential Assessment and the system's moderate risk waste programs are designed to address these problems. The following activities are designed to address this planning issue and are further described elsewhere in this section.

- Assess needs and educate children, the general public, and businesses and institutions, including governmental entities, concerning solid and moderate risk waste prevention and recycling.
- Develop and implement programs that will make waste prevention and recycling easier and more convenient for the general public and businesses and institutions, including governmental entities.
- Assess the desirability and feasibility of legal mandates and public incentives designed to encourage or require solid and moderate risk waste prevention and recycling, and implement as appropriate.
- Ensure that residents, businesses, and institutions have the opportunity to safely recycle solid and moderate risk wastes, through public or private measures.
- Develop, and where feasible implement, or recommend to the WUTC or other appropriate party, garbage and recycling rate incentives, or other financial incentives, which will encourage solid and moderate risk waste prevention and recycling.
- Assess present and future recyclable transport, processing, and remanufacturing needs and opportunities, and encourage such capability through coordinated actions with private enterprise.
- Utilize the MRW Facility to provide economic year round disposal of household and SQG wastes, and to maximize opportunities for reuse, recycling, pollution prevention, and education.
- Maintain effective communications and working relationships with, and where appropriate coordinate actions with, relevant private parties, other subdivisions of Whatcom County government, cities, towns, special purpose districts, and other state subdivisions within the county, other relevant county and city governments, and relevant state and federal agencies.