



ECOMED SERVICES

For a Cleaner, Brighter, and Safer Future

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April 8, 2016

Mr. Steven V. King, Executive Director
Washington Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504
Phone: 360-664-1115
Email: sking@utc.wa.gov

Subject: Request for Exemptions from the Commission Rule to Transport Regulated Medical Waste for Multicare Health System Only.

Dear Mr. King:

Per WAC 480-07-110, EcoMed Services - a Washington licensed business, UBI Number: 603487723 - is requesting an exemption of the Commission rules: WAC 480-70 – *Rules Relating to Solid Waste Collection Companies*, WAC 480-70-091 *Certificates, Applications*, in order to obtain a transport license to haul regulated medical waste for our potential business partner and customer, Multicare Health System (MHS).

This submission contains the following documents:

- Multicare Health System's Letter of Intent
- Manufacturer Appointment of Exclusive Representative Letter
- EcoMed's Sustainable Waste Management Solutions for MHS and Greenhouse Gas Reduction Summary Analysis (PowerPoint Slides) that includes service territory map.
- Press Release Articles: *Ten Cities with the Worst Traffic* article by *24/7 Wall St* and *Seattle No. 7* on list of cities with worst traffic in U.S. article by *Seattle Times*
- EcoMed's Services - References, Approvals, and Certificates Document
- Washington State Certificate of Formation of EcoMed Services, LLC
- EcoMed Services Tariff

As a distributor of innovative medical waste treatment technology, EcoMed Services has been working with MHS to provide sustainable onsite turnkey solutions (Localized onsite waste treatment operations and/or centralized waste treatment facilities based on non-burning technology) to manage, neutralize, and dispose safely of the generated medical waste from MHS facilities. Our clean technology is approved and/or accepted by numerous state agencies including Tacoma-Pierce and King County Health Departments. Please refer to Appendix A of *EcoMed References, Approvals, and Certificates Document*.

Because MHS is a network of healthcare providers with six medical centers and clinics across Pierce, Kitsap, Thurston, and King Counties, a transport operation is requested by our customer to manage the needs of small waste generators and to complement our proposed onsite solutions. EcoMed's proposition to have large medical centers equipped with onsite sterilizers is of great interest to our customer due to many benefits, such as establishing a sustainable and reliable operation, reducing liability, optimizing processes, and standardizing procedures. Our inclusive and integrated services will also cut carbon footprint, and lessen or eliminating the need for storing and/or transporting the infectious waste giving the fact that waste treatment will be done at the source of generation. Yet, generated waste from smaller facilities will not be processed/neutralized onsite. Therefore, it will be collected and transported to nearby MHS centralized waste treatment facilities for treatment and disposal. Please refer to *EcoMed's Sustainable Waste Management Solutions for MHS and Greenhouse Gas Reduction Summary Analysis (PowerPoint Slides)*. Accordingly, EcoMed Services is seeking authorization to operate in territories where MHS network exists. These territories consist of Pierce, Kitsap, Thurston, and King Counties.

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With a permitted authority to transport medical waste throughout MHS's network, EcoMed will provide essential, comprehensive, efficient, and compliant onsite and offsite medical waste management programs. Above all, our proposed solutions will also have tremendous benefits to our community and the environment by eliminating biomedical waste incineration, decreasing daily carbon footprint, reducing transport distances, and minimizing/eliminating traffic impact in a time when it is mostly needed. Correspondingly, in 2015 and based on data collected by INRIX, Seattle is among the most congested metro areas in the nation ranking number 7 city with the worst traffic. Please refer to the press release: *Ten Cities with the Worst Traffic* article by *24/7 Wall St* and Seattle No. 7 on list of cities with worst traffic in U.S. article by Seattle Times.

Per our customer's requirement, EcoMed Service will oversee and manage MHS onsite and offsite medical waste treatment and disposal programs that will include providing technology (sterilizers) and engineering, labor and operation, compliance and training, maintenance and quality control, collection and transport, and potential recycling applications of the end product (Treated medical waste). Please note that the transport operation is a complementary service to our customer and it is not for a compensation. Our customer is considering an all-inclusive service cost that will cover all offerings mentioned above.

For contingency plan, MHS expects us to use our permitted medical waste treatment facility in Vancouver, BC as a backup operation. This contingency plan is vital to reduce risks, protect the public health, and the environment especially during surge events, natural disasters, and epidemic outbreaks. Therefore, EcoMed Services is also seeking an authorization to operate along the highway I5 to be able to transport the medical waste to our facility only during any unexpected or surge events, natural disasters, and/or during epidemic outbreaks, such as the Ebola epidemic.

Since June 2013, under our sister company, EcoMed has held a hazardous waste transport license to transport regulated medical waste. Please refer to Appendix C of *EcoMed References, Approvals, and Certificates* Document. Per RCW 46.32.0804(A), EcoMed Services will obtain its own U.S. DOT number and operating authority and will comply with all federal, state, and local regulations. Abiding by our customers' compliance policies, we are expected to initially obtain approvals and conditional permits overseeing the overall management, handling, transportation, storage, and treatment of regulated medical waste prior to finalizing our service agreement. Therefore, a request for a conditional transport permit by the Commission will enable us to finalize our contract agreement with our customer and have our company allocate further resources, place purchase orders of equipment, and engage vendors for installations and commissioning, as well as to complete all compliance guidelines.

To better serve our communities and in response to the continuous requests from our customers for more sustainable solutions, clean technology, flexible choices, better value, optimized process, lean operations, and programs with cost savings, EcoMed's services and solutions were designed particularly to serve these requirements. Please refer to MHS's letter of intent demonstrating the essential goals of our customer and the need to partner with EcoMed Services. We believe that our propositions will set precedent for other educational entities and will benefit greatly our customers, communities, and the environment. To summarize some of our contributions, our sustainable operations and offerings were established to:

- Further advance the goals of managing medical waste in a manner which is most protective of human health and the environment.
- Promote clean air by adopting zero emission non-burning technology, and therefore, reducing greenhouse gas emissions by eliminating the needs to incinerate biomedical waste.
- Reducing the impact on landfills by reducing waste volume by 80%, and render its components unrecognizable and safe for disposal, recycling, and/or for waste to resources.
- Promote reduce, reuse, and zero waste practices by partnering with local companies to transform our treated waste to recyclable and reusable materials, Please refer to Appendix B of *EcoMed References, Approvals, and Certificates* Document.
- Minimize traffic impact and carbon footprint by establishing onsite waste treatment operations to eliminate/decrease hauling distances of offsite medical waste disposal.
- Reduce liability and develop better contingency plan by implementing redundant waste management operations.
- Respond to our customer's needs and provide sustainable solutions, efficient processes, flexible choices, better value, and cost-effective programs.



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Because EcoMed Services is a technology and onsite waste processing service provider that requires a hauling operation that is not for compensation to complement our unique and sought after services to our customer, we feel that a certificate based on variance to the rules may be justified taking into consideration the following rules:

- WAC 480-70-006 (1) states that, *"These rules apply to any solid waste collection company in the business of transporting solid waste for collection and/or disposal from points in the state of Washington, for compensation, over the public highways."*
- The 480-70-051 WAC: *Exemptions from Rules in Chapter 480-70 WAC* states, *"The commission may grant an exemption from the provisions of any rule in this chapter in the same manner and consistent with the standards and according to the procedures set forth in WAC 480-07-110."*
- The 480-70-006 WAC (3): *Application* states, *"Upon proper showing of any solid waste collection company, the commission may waive or modify as to that solid waste collection company the provisions of any rule in this chapter except when such provisions are fixed by statute."*
- The RCW 81.77.040: *Certificate of Convenience and Necessity Required* states, *"In all other cases, the commission may, with or without hearing, issue certificates, or for good cause shown refuse to issue them, or issue them for the partial exercise only of the privilege sought, and may attach to the exercise of the rights granted such terms and conditions as, in its judgment, the public convenience and necessity may require."*
- The RCW 480-70-351: *Rates, recycling programs, credits, or charges, (1) Programs to encourage recycling.* *The commission encourages solid waste collection companies to develop programs intended to increase recycling."*

Abiding by our customer's Non-Disclosure Agreement and per WAC 480-07-160 *Confidential Information*, this submission is believed to contain valuable information that should be treated confidential to protect the confidentiality of our customer and our offerings.

Should you have any questions or need of any additional information, feel free to contact me at (206) 427-6641 or via email at asqualli@EcoMedServices.com.

Warmest Regards,

Alex Squalli
President and Managing Partner

Enclosure