

**EXH. JDS-15  
DOCKETS TG-220215/TG-220243  
WITNESS: JAMMIE D. SCOTT**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Application of  
JAMMIE’S ENVIRONMENTAL,  
INC.,**

**For Authority to Operate as a Solid  
Waste Collection Company in  
Washington**

**Docket TG-220243**

**BASIN DISPOSAL, INC.,**

**Complainant,**

**v.**

**JAMMIE’S ENVIRONMENTAL,  
INC.,**

**Respondent.**

**Docket TG-220215**

**FOURTEENTH EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED DIRECT TESTIMONY OF**

**JAMMIE D. SCOTT**

**ON BEHALF OF JAMMIE’S ENVIRONMENTAL, INC.**

**SEPTEMBER 16, 2022**

**From:** [McPherson, Kathryn \(UTC\)](#)  
**To:** [Lisa Cothren](#)  
**Cc:** [Jammie Scott](#)  
**Subject:** FW: Regulations for exemption on solid waste carrier  
**Date:** Tuesday, February 15, 2022 2:17:31 PM  
**Attachments:** [image001.png](#)  
[Solid Waste Application New.pdf](#)  
[How To File A Solid Waste Tariff \(1\).pdf](#)  
[Tariff template approved by Commissioners - 062818.doc](#)  
[Solid Waste Application - Completed Example.pdf](#)

---

After investigation of your company's activity at PCA, Staff recommends applying for a certificate.

RCW 81.77.040 outlines the requirement to have a certificate. After review by our attorney, the cleanup services provided are incidental to the hauling of waste, not that the hauling of waste is incidental to the cleanup. Therefore a certificate would be required.

All applications are subject to public protest and your application must demonstrate that the current solid waste collection company in your proposed service area is not providing the service your company will offer. The commission only grants new certificates if the current company is unfit, unwilling, or unable to provide the service.

Our licensing division is able to assist you in the application process. Their contact numbers are available on the solid waste application.

Sincerely,

Kathryn McPherson  
Investigator, Solid Waste Enforcement  
(360) 522-6121

This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

---

**From:** McPherson, Kathryn (UTC)  
**Sent:** Thursday, January 20, 2022 4:49 PM  
**To:** 'Jammie@jammiesenviro.com' <Jammie@jammiesenviro.com>  
**Cc:** Villar, Eric (UTC) <eric.villar@utc.wa.gov>  
**Subject:** Regulations for exemption on solid waste carrier

Jammie,

Thank you for speaking with me in detail about your business. I am including the link to apply for your common carrier permit. Based on our discussion, your company is exempt from requiring a solid waste certificate. The service of transporting waste is incidental to the cleanup and collection onsite of the industrial waste.

[WAC 480-70-011](#) (1) (g) The operations of private carriers who, in their own vehicles, transport solid waste purely as an incidental adjunct to some other established private business owned or operated by them in good faith.

By definition of [WAC 480.70.041](#), your company does transport waste: Solid waste or solid wastes means all putrescible and nonputrescible solid and semisolid wastes including, but not limited to:

- Garbage;
- Rubbish;
- Refuse;
- Swill;
- Ashes;
- **Industrial wastes;**
- Sewage sludge;
- Demolition and construction wastes;
- Abandoned vehicles or parts of abandoned vehicles; and
- Source-separated recyclable materials collected from single and multifamily residences.

Your company would be classified as a common carrier.

[RCW 81.77.010](#) (1) "Common carrier" means any person who collects and transports solid waste for disposal by motor vehicle for compensation, whether over regular or irregular routes, or by regular or irregular schedules;

Common carriers are required to have a permit based on [RCW 81.80.075](#) (1) (1) A common carrier, contract carrier, or temporary carrier shall not operate for the transportation of property for compensation in this state without first obtaining from the commission a permit for such operation.

Link for [Common Carrier Application](#). The application can be filed online at <https://efiling.utc.wa.gov/Form>.

I am including Eric Villar on this email. He is responsible for the processing of new common carrier applications and very knowledgeable. Also, per our discussion, here is my best knowledge of "flow control." Its very basic for me to help keep track of info on counties.

Thank you,

**Kathryn McPherson**  
Investigator, Solid Waste Enforcement  
Transportation Safety Division  
(360) 522-6121  
[Kathryn.Mcpherson@utc.wa.gov](mailto:Kathryn.Mcpherson@utc.wa.gov)  
[www.utc.wa.gov](http://www.utc.wa.gov)



This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.