

**Exh. SP-1T  
Docket TG-240590  
Witness: Stevin Peters**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of Determining the Proper  
Carrier Classification of, and Complaint  
for Penalties Against,**

**HUESITOS COMPANY II, LLC**

**DOCKET TG-240590**

**TESTIMONY**

**OF STEVIN PETERS**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Testimony in Support of Settlement*

**March 20, 2025**

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1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is Stevin Peters. My business address is 621 Woodland Square Loop SE,  
5 Lacey, Washington, 98503. My business mailing address is P.O. Box 47250, Olympia,  
6 Washington, 98504-7250. My email address is stevin.peters@utc.wa.gov.

7

8 **Q. By whom are you employed and in what capacity?**

9 A. I work in the Motor Carrier Section of the Transportation Safety Division of the  
10 Washington Utilities and Transportation Commission (Commission) as a Solid Waste  
11 Compliance Investigator 3. I have worked at the Commission since June 2024.

12

13 **Q. Please provide your education and professional background.**

14 A. I have a B.A. Degree in Political Science from Western Washington University. I have  
15 been an investigator with the Commission Since June 2024. Previously, I worked as a  
16 Community Corrections Officer with the Washington Department of Corrections for five  
17 years.

18

19 **Q. Have you previously testified before the Commission?**

20 A. No.

1 **II. SCOPE AND SUMMARY OF TESTIMONY**

2

3 **Q. What is the purpose and scope of your testimony?**

4 A. The purpose of this testimony is to provide evidence relevant to this case (TG-240590)  
5 and settlement, including why the settlement is in the public interest.

6

7 **Q. Were you involved in the investigation of Huesitos Company LLC?**

8 A. Yes.

9

10 **Q. What was your involvement in the investigation?**

11 A. I am the investigator that took over the case from the previous investigator, Kathryn  
12 McPherson, around August 2024, as she transferred to a new role. I was present at the  
13 Basin Disposal Transfer Station located at 1721 Dietrich Road, Pasco, Washington on  
14 July 23, 2024, where I observed Huesitos Company LLC (Huesitos or the Company)  
15 disposing of construction debris. I have been involved in the investigation and settlement  
16 of this matter.

17

18 **Q. When did you take over the investigation from the prior investigator?**

19 A. I took over the investigation from the previous investigator around August 2024.

20

21 **Q. What did you do to come up to speed on the investigation?**

22 A. I reviewed the prior technical assistance that the previous investigator had provided to  
23 Huesitos over the prior year. This informed me of the attempts of the previous

1 investigator to gain voluntary compliance with Commission regulations. As a result,  
2 these new allegations are subject to enforcement action rather than technical assistance.

3  
4 **Q. Can you briefly explain the background of this case.**

5 A. Huesitos illegally hauled solid waste at least 80 times between March 12 and October 31,  
6 2024, without the required certificate (RCW 81.77.040). The Company disposed of 67  
7 loads of construction debris and placed 13 drop-boxes at residential sites, despite prior  
8 technical assistance from Staff in 2023, which included a non-compliance letter, phone  
9 calls, and in-person guidance on regulatory requirements. The Company initially agreed  
10 to withdraw from unpermitted activities but later resumed operations. Given the  
11 seriousness and repeated nature of the violations, and failure to comply after technical  
12 assistance was provided, Staff filed a complaint with the Commission requesting  
13 Huesitos be classified as a solid waste collection company and impose \$80,000 in  
14 penalties, as authorized by RCW 81.04.380.

15  
16 **Q. Did Staff provide the Company technical assistance prior to issuing the complaint?**

17 A. Yes.

18  
19 **Q. What technical assistance did Staff provide?**

20 A. UTC Staff provided extensive technical assistance to Huesitos in 2023 to help the  
21 Company comply with solid waste regulations:

- 22 1. August 9, 2023: Staff observed Huesitos disposing of construction debris at a  
23 transfer station and began outreach efforts.

- 1           2. August 24, 2023: Staff sent a non-compliance letter in English and Spanish,  
2           explaining that Huesitos' operations required a solid waste certificate.
- 3           3. August 28, 2023: Staff spoke with the Company's office manager by phone,  
4           clarifying the regulatory requirements.
- 5           4. September 6, 2023: Staff had a detailed conversation with the owner, Silvestre  
6           Hueso, using a translator. Staff explained that leaving drop-boxes for contractors  
7           to load constituted solid waste collection, which required a certificate. Alternative  
8           business models were discussed, such as transporting materials to a Material  
9           Recovery Facility (MRF), though none were available locally. The owner  
10          acknowledged the issue and agreed to withdraw by September 30, 2023.
- 11          5. September 6, 2023: Staff coordinated with Basin Disposal and Hayden Homes to  
12          facilitate a transition to a certified waste hauler.
- 13          6. September 27, 2023: Basin Disposal confirmed it was prepared to assume service  
14          for Hayden Homes.
- 15          7. October 17, 2023: The case was closed, as Huesitos had ceased providing drop-  
16          box services.

17

18 **Q. Did the Company come into compliance after that technical assistance was**  
19 **provided?**

20 A. Although Huesitos initially ceased operations following technical assistance in  
21 September 2023, the Company resumed unpermitted waste hauling in March 2024.

- 22          1. October 2023: The Company removed its drop-boxes and stopped operations,  
23          leading to the case being closed on October 17, 2023.

- 1           2. March 12 – October 1, 2024: Huesitos resumed unauthorized waste hauling,  
2           disposing of 67 loads of construction debris at Horn Rapids Landfill.
- 3           3. October 2 – October 31, 2024: The Company placed 13 drop-boxes at residential  
4           construction sites, allowing contractors to load debris for disposal at Horn Rapids  
5           Landfill and Basin Disposal Transfer Station.
- 6           4. May – October 2024: Staff received multiple illegal hauler reports and  
7           photographic evidence confirming that Huesitos was actively operating without  
8           the required certificate.

9           Despite prior technical assistance, warnings, and agreement to withdraw, Huesitos  
10          returned to non-compliant operations, leading to renewed investigation and enforcement  
11          actions.

12

13 **Q. Is there a settlement in this case?**

14 A. Yes.

15

16 **Q. Have all parties agreed to this settlement?**

17 A. Yes

18

19 **Q. What is Staff’s recommendation?**

20 A. Staff recommends that the Commission adopt the settlement without condition.

21

22

23

1 **Q. What is the basis for Staff's recommendation?**

2 A. The terms of this settlement entirely resolve this matter and are in the public interest.  
3 These terms strike an important balance between ensuring future compliance from the  
4 Company while also resolving the issue of the violations currently before the  
5 Commission.

6

7 **Q. What are the terms of the settlement agreement?**

8 A. There are seven main terms to this agreement: (1) Admission of violations, (2) agreement  
9 to classification, (3) cease and desist, (4) bin removal, (5) monetary penalty, (6) payment  
10 plan for monetary penalty, and (7) compliance reviews.

11

12 **Q. Why is admission of the violations in the public interest?**

13 A. Huesitos' admission of 80 violations of RCW 81.77.040 ensures accountability and  
14 establishes a factual basis for enforcement actions. Public interest is served by deterring  
15 unpermitted waste hauling, which protects regulated businesses and ensures  
16 environmental and public health standards are met.

17

18 **Q. Why is classifying Huesitos Company LLC as a solid waste company in the public  
19 interest?**

20 A. Classifying Huesitos as a solid waste collection company ensures that the Company is  
21 subject to appropriate regulations and oversight under RCW 81.77.040 and WAC 480-70.

22 This classification prevents unregulated operations that could undermine lawful waste

1 management services, create safety or environmental risks, and create unfair business  
2 practices.

3  
4 **Q. Why is the cease and desist term in the public interest?**

5 A. By requiring Huesitos to cease unpermitted operations immediately, this order prevents  
6 continued violations of Washington law and protects lawful waste haulers as they have  
7 increased regulatory requirements. It also ensures consumer protection by preventing  
8 businesses from operating outside of regulatory oversight.

9  
10 **Q. Why is the bin removal term in the public interest?**

11 A. The removal of improper bins ensures that Huesitos does not continue to provide  
12 unpermitted waste collection services. Prompt action (within 10 days) reduces the risk of  
13 further violations and aligns with public health and environmental regulations. The  
14 inclusion of a penalty mechanism for non-compliance reinforces the importance of timely  
15 adherence to the agreement.

16  
17 **Q. Why is the monetary penalty in the public interest?**

18 A. The \$80,000 penalty, with \$20,000 due and payable, serves as a deterrent against future  
19 violations while the suspension of the remaining \$60,000 incentivizes compliance. This  
20 balance promotes voluntary compliance while ensuring that non-compliance carries  
21 financial consequences. The structured penalty also ensures fairness in enforcement,  
22 allowing for leniency if Huesitos complies fully with regulations over the next two years.

1 **Q. Why are the compliance reviews in the public interest?**

2 A. Regular compliance reviews at 6, 12, 18, and 24 months ensure ongoing oversight and  
3 provide opportunities for corrective actions before further penalties are imposed. By  
4 requiring Huesitos to disclose its client list and worksite locations, the Commission gains  
5 the necessary transparency to verify lawful operations. This protects both consumers and  
6 legal operators in the industry.

7  
8 **Q. Why is providing a payment plan in the public interest?**

9 A. Allowing Huesitos to pay the \$20,000 penalty in 24 monthly installments makes  
10 compliance more feasible while still holding the Company accountable. This approach  
11 ensures financial consequences for past violations without causing undue hardship that  
12 could lead to further non-compliance or bankrupting legitimate landscaping operations.  
13 The structured payment plan provides an opportunity for the Company to transition into  
14 legal operation while ensuring the penalty is collected in full.

15  
16 **Q. Is there anything else regarding this settlement?**

17 A. Staff believes this settlement strengthens regulatory enforcement, maintains fair  
18 competition in the industry, and ensures that waste management practices in Washington  
19 meet established safety, environmental, and legal standards.

20  
21 **Q. Does this conclude your testimony?**

22 A. Yes.