

**EXH. OJS-1T  
DOCKETS TG-220215/TG-220243  
WITNESS: OWEN J. 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**

**PREFILED DIRECT TESTIMONY (NONCONFIDENTIAL) OF**

**OWEN J. SCOTT**

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

**SEPTEMBER 16, 2022**

**JAMMIE’S ENVIRONMENTAL, INC.**

**PREFILED DIRECT TESTIMONY (NONCONFIDENTIAL) OF  
OWEN J. SCOTT**

**CONTENTS**

I. INTRODUCTION .....1

II. JAMMIE’S OPERATIONS AT THE PCA MILL .....2

III. JAMMIE’S OCC REJECTS WORK FOR PCA .....3

IV. BDI’S OCC REJECTS DISPOSAL PROBLEMS AT THE MILL AND  
JAMMIE’S RESOLUTION OF THE PROBLEM.....5

V. CONCLUSION.....15

**JAMMIE’S ENVIRONMENTAL, INC.**

**PREFILED DIRECT TESTIMONY (NONCONFIDENTIAL) OF  
OWEN J. SCOTT**

**LIST OF EXHIBITS**

- |            |  |
|------------|--|
| Exh. OJS-2 | May 19, 2021 JEI proposal to PCA.              |
| Exh. OJS-3 | May 20, 2021 PCA Purchase Order to JEI.        |
| Exh. OJS-4 | August 2, 2021 photo of the OCC yard.          |
| Exh. OJS-5 | September 15, 2022 photo of the OCC yard.      |
| Exh. OJS-6 | September 15,, 2022 photo of JEI belt trailer. |

1 **JAMMIE’S ENVIRONMENTAL, INC.**

2 **PREFILED DIRECT TESTIMONY (NONCONFIDENTIAL) OF**  
3 **OWEN J. SCOTT**

4 **I. INTRODUCTION**

5 **Q. Please state your name, business address, and position with Jammie’s**  
6 **Environmental, Inc.**

7 A. My name is Owen J. Scott. My business address is 128 Industrial Way,  
8 Longview, WA 98632. I am Operations Manager at Jammie’s Environmental, Inc.  
9 (“Jammie’s” or “Company”).

10 **Q. What are your responsibilities as Operations Manager?**

11 A. As Operations Manager, I oversee the day-to-day operations of the Company  
12 including managing ongoing projects in the field, equipment maintenance,  
13 building estimates, and customer service, among other tasks.

14 **Q. What experience do you have in this capacity?**

15 A. I have worked in the industrial waste handling, management, cleaning,  
16 transportation and disposal business since my career started in 1990. I have  
17 worked in and overseen industrial cleaning operations in pulp and paper mills,  
18 steel mills, shipyards, railroads, power plants, chemical plants, asphalt plants, tank  
19 farms, superfund sites, and have developed significant experience in industrial  
20 waste cleaning. I consider myself an expert in this field.

1 **Q. What topics are you covering in your testimony?**

2 A. I describe Jammie's work generally at Packaging Corporation of America's  
3 ("PCA") integrated pulp and paper mill, neutral sulfite semi-chemical pulping, old  
4 corrugated cardboard/container ("OCC") facility, and corrugated medium and box  
5 plant in Wallula, Washington (the "Mill"). I explain how Jammie's became  
6 involved in assisting in disposing, and later managing, waste generated from  
7 PCA's OCC facility known as "OCC Rejects." I describe how Basin Disposal,  
8 Inc. ("BDI"), the incumbent solid waste disposal company in the area, failed to  
9 develop an appropriate plan for managing and disposing of the OCC Rejects,  
10 reflecting a complete lack of experience in handling this type of industrial waste. I  
11 further explain how Jammie's quickly developed an effective solution for the  
12 OCC Rejects completely resolving the issue for PCA.

13 **II. JAMMIE'S OPERATIONS AT THE PCA MILL**

14 **Q. Are you familiar with the work that Jammie's does at the Mill in Wallula,**  
15 **Washington?**

16 A. Yes. Jammie's has provided a variety of industrial cleaning and maintenance  
17 services at the Mill for over a decade. Please see the Prefiled Direct Testimony of  
18 Jammie D. Scott, Exh. JDS-1T at page 8, for a summary of those services.

1 **Q. Have you ever been to the Mill?**

2 A. Yes, I have been to the Mill countless times over the years as part of my role as  
3 Operations Manager. I regularly stop by the Mill to oversee the work Jammie's  
4 employees do at the Mill daily.

5 **Q. Do you interact with PCA?**

6 A. Yes, very frequently. I regularly discuss projects being performed by Jammie's at  
7 the Mill with PCA's plant managers and other employees. These discussions are  
8 either in person when I am at the Mill or by telephone if I am off-site. PCA  
9 employees frequently contact me to discuss projects at the Mill. PCA knows they  
10 can contact Jammie's if they have unique or difficult industrial waste issues  
11 because Jammie's prides itself in problem solving and finding efficient solutions  
12 for customers. It is something I have successfully done for PCA and other  
13 customers throughout my career.

14 **III. JAMMIE'S OCC REJECTS WORK FOR PCA**

15 **Q. Are you familiar with OCC Rejects?**

16 A. Yes. OCC Rejects are an industrial waste stream generated from producing paper  
17 products from old corrugated cardboard/containers or "OCC." OCC, comprised of  
18 used boxes and other cardboard waste, is delivered in bales that are about 8 x 4 x  
19 4 feet in size. The bales are sent through a recycling process that reduces the used  
20 cardboard into pulp that can then be used to make new cardboard. OCC material

1 that cannot be recycled such as plastic, steel, tape and other non-fibrous, non-  
2 recyclable material creates a processed waste known as “OCC Rejects.” When  
3 generated, OCC Rejects are often wet due to the use of water as part of the OCC  
4 recycling process.

5 **Q. Does PCA generate OCC Rejects at the Mill?**

6 A. Yes. In 2020, PCA began repurposing a building at the Mill to process OCC. In  
7 March 2021, PCA began processing OCC at the Mill and began generating OCC  
8 Rejects. I was at the Mill many times during this period and saw the construction  
9 of the OCC facility.

10 **Q. When did Jammie’s first provide services related to PCA’s OCC operations?**

11 A. Jammie’s started working in what is now the OCC facility during construction in  
12 August 2020. At that time, Jammie’s cleaned processing piping and tanks as PCA  
13 repurposed the facility to handle OCC operations. I personally oversaw that work.  
14 This work has continued, including after the OCC facility began operating in  
15 early March 2021. Today, Jammie’s cleans the OCC process equipment and the  
16 surrounding area to help ensure it operates properly.

17 **Q. Describe those cleaning services.**

18 A. Jammie’s provides various cleaning services related to the OCC area, including  
19 water blasting and cleaning all pulp chests; cleaning OCC process equipment,  
20 OCC wastewater trench drains and sumps, OCC pulp stock transmission lines,

1 and OCC turbo separator tanks; generally cleaning the area; and jetting plugged  
2 lines. As part of that process, OCC Rejects are also generated and collected for  
3 disposal. Because of Jammie's extensive work in the OCC facility, we understand  
4 the OCC process and the OCC Reject waste generated from that process well.

5 **Q. Were you ever present at the Mill in March 2021?**

6 A. While I cannot remember the exact dates, I was at the Mill on multiple occasions  
7 shortly after PCA began OCC operations to oversee Jammie's work in the OCC  
8 facility.

9 **IV. BDI'S OCC REJECTS DISPOSAL PROBLEMS AT THE**  
10 **MILL AND JAMMIE'S RESOLUTION OF THE PROBLEM**

11 **Q. What happens to OCC Rejects after they are generated from the OCC**  
12 **process?**

13 A. OCC Rejects are often very wet from the water used in the OCC process and  
14 require dewatering and other handling to prepare it for disposal. As I explain  
15 below, Jammie's developed an effective process for dewatering and preparing the  
16 OCC Rejects for disposal. OCC Rejects then must be disposed of in a qualified  
17 waste disposal facility.

18 **Q. Are you familiar with how PCA initially disposed of OCC Rejects?**

19 A. Yes, based on my observations at the Mill, BDI was responsible for disposing of  
20 the OCC Rejects. PCA would load the OCC Rejects into container bins supplied  
21 by BDI. I saw the containers located at the Mill that I understand BDI used to



1 transport the OCC Rejects. To my knowledge, BDI did not perform any loading  
2 or handling services with regards to PCA's OCC Rejects. BDI merely transported  
3 the OCC Rejects for disposal.

4 **Q. Did you observe any problems with these operations?**

5 A. Yes, it did not appear to be going well. During my visits, I noticed that BDI's  
6 containers were always full of OCC Rejects and witnessed PCA's OCC loader  
7 dumping OCC Rejects onto a growing stockpile of uncollected OCC Rejects. The  
8 yard outside the OCC building was a mess of piles of OCC Rejects and OCC  
9 Rejects generally strewn all over the yard. PCA employees expressed frustration  
10 to me for how it was going.

11 **Q. Did you agree with BDI's approach to disposing of the OCC Rejects?**

12 A. Not at all. Containers bins are acceptable for hauling general garbage but are not  
13 the proper disposal method for OCC Rejects because they fill too quickly. BDI  
14 also was not picking up the bins fast enough leading to piles of uncollected OCC  
15 Rejects in the yard as well as full, but uncollected bins. BDI also would not  
16 dispose of bins that had too much water content due to weight and leaking water.  
17 While BDI's concern with the wet material is understandable, the water content  
18 problem can be resolved by mixing dry and wet OCC Rejects to reduce the  
19 moisture content. As I explain in more detail below, once Jammie's got involved,  
20 that solution was very effective in resolving the moisture problem.

1 **Q. Why did BDI take the approach it did?**

2 A. While I cannot answer for BDI, I believe it is because that approach is how BDI  
3 handles standard solid waste. BDI is a traditional solid waste garbage company  
4 whose primary business is collecting and disposing of household garbage from  
5 conventional residential and commercial customers. BDI's normal practice is to  
6 simply pick up containers or garbage cans when full on a regular collection  
7 schedule, but it does not typically provide any on-site services, such as mixing  
8 waste. Because of that, I believe BDI simply employed its standard approach  
9 dropping off container bins for loading by the customer. Below is a generic  
10 picture of the type of truck and container BDI was using for the OCC Rejects. As  
11 we quickly learned, however, BDI's approach did not work for the OCC Rejects.



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1 **Q. Was PCA concerned with BDI's service?**

2 A. Yes, as was I. PCA's employees expressed significant concern to me with BDI's  
3 challenges in disposing of the OCC Rejects because the problem was getting  
4 worse. The piles of uncollected OCC Rejects were growing and were impeding  
5 PCA's operations. From my perspective, the growing OCC rejects stockpile on  
6 the side of the building was also a cause for concern for the structural integrity of  
7 the building and also presented a significant fire hazard.

8 **Q. How are the OCC Rejects a fire hazard?**

9 A. During a site visit in May 2021, I witnessed roughly 1,000 cubic yards of  
10 uncollected OCC Rejects stockpiled against a building. This material is all  
11 pulp/paper-based and is flammable. And, just around the corner from the OCC  
12 building is the yard that holds the OCC bails—the recycled cardboard coming into  
13 the facility. I was aware of the time of year—the last week of May, going into  
14 June—because two-to-three weeks per month in the summer months, Jammie's  
15 has a crew that goes to the Mill for fire prevention services, including cleaning  
16 sawdust off and away from the rail tracks. In this location of the state, it is hot and  
17 dry beginning around this time. A fire risk accumulating against a large building  
18 (and around the corner from a high volume of recycled cardboard) is objectively a  
19 cause for concern. I know PCA was concerned about the fire risk.

1 **Q. How did Jammie's become involved in the OCC Rejects?**

2 A. In or around May 2021, I was onsite at the PCA facility performing unrelated  
3 cleaning operations and saw uncollected OCC Rejects piled up against the  
4 exterior wall of the OCC building. I had noticed the problem previously but this  
5 time, the piles of OCC Rejects were higher. The below picture from April 2021  
6 shows a pile of OCC Rejects on the side of this building, similar to what I  
7 witnessed:<sup>1</sup>



8

9 However, what I saw was even worse. The piles of uncollected OCC Rejects  
10 nearly reached the blue line on the OCC building, seen in the above photo. I

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<sup>1</sup> See Exh. JDS-2.

1 estimated that there was about 1,000 cubic yards of OCC Rejects piled against  
2 that wall. Uncollected OCC Rejects were also scattered all over the OCC yard and  
3 there were full, but uncollected BDI bins.

4 **Q. What happened next?**

5 A. I was meeting with the Mill Operations Manager Brian Wilhelm where we were  
6 discussing various projects at the Mill. During that meeting, we discussed the  
7 growing piles of uncollected OCC Rejects. Brian told me that BDI was struggling  
8 to properly handle and process the volume of OCC Rejects and that any ideas or  
9 help that Jammie's could offer would be appreciated.

10 **Q. Did Jammie's get involved?**

11 A. Yes, it did. Initially, we were brought into help stem the tide of uncollected and  
12 rapidly accumulating OCC Rejects that were going uncollected. We first used a  
13 30-yard dump truck and a "pup" trailer to help with disposing the OCC Rejects.<sup>2</sup>  
14 For weeks, Jammie's worked in tandem with BDI in disposing of the material.  
15 Initially, PCA provided the primary loading services using a Bobcat loader. While  
16 the OCC Reject waste stream was getting under control, BDI's plan of primarily  
17 using container boxes still was not working. Below is a picture from August 2,

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<sup>2</sup> See Exh. OSJ-2; Exh. OSJ-3.

1  
2

2021, showing piles of uncollected OCC Rejects still against the OCC building and full BDI bins:<sup>3</sup>



3

4 **Q. Did Jammie’s role in disposing of the OCC Rejects change?**

5 A. Yes. My team and I quickly determined that BDI’s plan for disposing of the OCC  
6 Rejects was not efficient or sustainable and Jammie’s began experimenting with  
7 different solutions. For example, we proposed that Jammie’s use an 86 cubic yard  
8 belt trailer and its own, larger five-yard loader to assist with loading in the OCC  
9 Rejects. The belt trailer and loader were game changers as it allowed us to, in real  
10 time, much more efficiently load and transport the OCC Rejects for disposal. PCA

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<sup>3</sup> See Exh. OJS-4.



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no longer had to wait for BDI to deliver empty container bins. We also developed an effective method of reducing the moisture content in the wet OCC Rejects. We constructed a makeshift ‘bunker’ which we used to mix wet and dry OCC Rejects for disposal. This additional processing, while labor intensive and time consuming, was highly effective in preparing the OCC Rejects for disposal. Later, PCA constructed a second, more permanent bunker next to the OCC building. As discussed in Ms. Scott’s testimony, Exh. JDS-1T, by mid-August 2021, we had added a second 86 cubic yard belt trailer, and had developed an effective process for managing and disposing of the OCC Rejects that resolved the problem for PCA. Below is a recent picture of the OCC yard with the bunker we built for PCA in the rear and a much cleaner and better organized yard area:<sup>4</sup>



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<sup>4</sup> See Exh. OJS-5.

1 The bunker PCA built is the concrete structure on the right. As you can see,  
2 instead of uncollected container bins sitting in the OCC yard, the yard is open,  
3 aside from a small pile of OCC Rejects that are ready for disposal. The loader on  
4 the left of the picture is the loader Jammie's brought in to mix and load the OCC  
5 Rejects more efficiently. Below is a picture of one of Jammie's belt trailers used  
6 to haul and dispose of the OCC Rejects:<sup>5</sup>



7  
8 **Q. Was PCA pleased with Jammie's service?**

9 A. Yes. PCA had been incredibly frustrated that BDI was constantly behind in  
10 disposing of the OCC Rejects. PCA greatly appreciated Jammie's developing an  
11 effective solution for the OCC Rejects. I believe that is why PCA has asked  
12 Jammie's to provide the service going forward.

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<sup>5</sup> See Exh. OJS-6.



1 **Q. During the months when Jammie's assisted BDI with the OCC Rejects**  
2 **disposal, did BDI ever raise any concerns with Jammie's about whether**  
3 **Jammie's should assist with disposing of the OCC Rejects?**

4 A. Not to me. BDI always seemed grateful that we were helping reduce the load. I  
5 was surprised when in the fall 2021, BDI's tone changed, and they began  
6 threatening Jammie's for continuing to dispose of the OCC Rejects. I thought it  
7 was odd they were criticizing Jammie's for doing a job they clearly could not do.

8 **Q. Do OCC Rejects require any special handling, processing, packaging,**  
9 **transportation and/or disposal?**

10 A. Yes. OCC Rejects are not like standard commercial or residential solid waste.  
11 They are an industrial waste generated as part of the OCC manufacturing process.  
12 OCC Rejects are often too wet and heavy to haul as would you haul standard  
13 waste. Because of the volume of OCC Rejects generated, and the wet and heavy  
14 nature of the material, full-time management is required to collect, process, load,  
15 and haul the OCC Rejects. It cannot simply be loaded unprocessed into container  
16 bins for pickup like normal garbage service. Before Jammie's involvement, BDI  
17 was attempting to haul raw OCC Rejects to the transfer station which was not  
18 working. This reflects considerable inexperience with industrial wastes like the  
19 OCC Rejects on BDI's part.

**V. CONCLUSION**

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**Q. Does that conclude your prefiled direct testimony?**

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**A. Yes, it does.**