

December 8, 2000

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket No. TG-990161
Solid Waste Rulemaking: 480-70 WAC

Dear Ms. Washburn:

Thank you for the opportunity to provide comment on this proposed rule making. We have several recommended changes, outlined below.

1. Pertaining to WAC 480-70-011 Exempt Operations, subsection (e), we recommend that materials collected for recycling from "agricultural" generators also be exempt.

Rationale: There is a rapidly growing problem with horse waste and bedding from "hobby stables" with 2-5 horses, located on relatively small parcels of land in suburban areas. These are not commercial operations, and therefore collection of material from them would not be exempted as from commercial generators. However, there is a significant quantity of material generated from these stables and it is important that a range of collection options exist to encourage movement of animal wastes from these small parcels to composting and topsoil facilities.

2. Related to the comment above, the definition for "Commercial recycling service" also should be changed to include the transportation of materials from agricultural generators.
3. Pertaining to WAC 480-70-271 Customer notice requirements, subsection (1) (b) (ii) and (iii): Please include this additional language: "and their designated solid waste manager."

Rationale: It is important that these materials are received by elected officials, but they sometimes do not get passed down to department heads before inquiries from ratepayers begin, or comment periods end. Sending notification to the appropriate solid waste contact will assist with coordination and provide for better customer service.

4. Please also revise WAC 480-70-271 Customer notice requirements subsection (1) (b) (ii) to read: "County commissioners or councilmembers..."

If you need further clarification on these comments, I can be reached at 425-388-6486.

Sincerely,

Jeff Kelley-Clarke
Solid Waste Utility Director