

EXHIBIT RM-15  
DOCKET: TG-200083  
RIDWELL INC. CARRIER CLASSIFICATION  
WITNESS: RYAN METZGER

BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF DETERMINING THE  
PROPER CARRIER CLASSIFICATION OF:

No. TG-200083

RIDWELL, INC.

FIFTEENTH EXHIBIT TO THE DIRECT TESTIMONY OF RYAN METZGER  
Conditional solid waste permit exception for Ridwell, from Environmental Services Division,  
King County, April 15, 2020  
ON BEHALF OF RIDWELL, INC.

May 5, 2020

**Environmental Health Services Division**

401 Fifth Avenue, Suite 1100  
Seattle, WA 98104

**206-263-9566** Fax 206-296-0189  
TTY Relay: 711

www.kingcounty.gov/health

April 15, 2020

Ridwell  
Ryan Metzger, CEO  
1920 Occidental Ave S, Unit A  
Seattle, WA 98134

**RE: Conditional solid waste permit exemption approval for the mobile collection system and material recovery at the Ridwell facility, 1920 Occidental Ave S, Unit A, Seattle (SR1437638)**

Dear Mr. Metzger:

Thank you for submitting an updated Notice of Intent (NOI) to operate under terms and conditions for solid waste permit exemption on March 24, 2020 following your facility's move to a new location. Based on our virtual inspection of the facility on April 3, 2020 and review of your submissions, this facility conditionally qualifies for permit exemption if operated in accordance with Table 360-A of Washington Administrative Code (WAC) 173-350-360 and Table 210-A(3) of WAC 173-350-210.

Please review and abide by the following specific conditions to continue operating under a solid waste handling permit exemption.

1. Report annually as required by April 1<sup>st</sup>.
2. Provide documentation from Seattle Department of Construction and Inspections (SDCI) that use of this facility is acceptable for the zoning designation.
3. Provide 30-day notification for new waste streams or moving to a new location.
4. Follow requirements for universal waste handling for the compact fluorescent lamp (CFL) bulbs and batteries.
5. Continue compliance with Washington State Utilities and Transportation Commission (UTC) requirements to ensure performance standards according to WAC 173-350-040.

This letter allows you to conditionally operate a moderate risk waste mobile collection system and recycling and material recovery facility under a solid waste handling permit exemption for the facility located at 1920 Occidental Ave S, Unit A, Seattle, WA 98134 until Public Health is available to conduct a field visit. Failure to meet these conditions will limit your business to only non-solid waste items according to WAC 173-350-021 and may result in permitting requirements or enforcement with civil penalties.

The conditionally exempted solid waste activity at the time of this letter for the facility is the mobile collection of moderate risk waste consisting of batteries, lightbulbs and electronics in addition to the material recovery of clothing/shoes, plastic film (LPDE plastics), and styrofoam.

Periodic re-inspections of the facility will be conducted to verify continued compliance with WAC 173-350-360 and WAC 173-350-210 requirements. At any time the facility operates outside the terms and conditions for exemption as outlined in Table 360-A of WAC 173-350-360 and Table 210-A(3) of WAC 173-350-210, it may be subject to the permitting requirements for solid waste handling under WAC 173-350-360 and WAC 173-350-210.

This permit exemption is non-transferable, and moving to a new facility will require submittal of a new Notice of Intent (NOI) to operate under terms and conditions for solid waste permit exemption 30 days prior to operating at the new facility.

If you have any questions regarding the regulatory requirements for this facility or need further assistance, please contact me at (206)-477-0184 or via e-mail at [eyalew@kingcounty.gov](mailto:eyalew@kingcounty.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Eyasu Ayalew', with a horizontal line drawn through the middle of the signature.

**Eyasu Ayalew, MS, RS**  
Health and Environmental Investigator III  
Solid Waste, Rodent and Zoonotic Program

cc: Dawn Marie Maurer, Facilities Specialist, Department of Ecology, Northwest Regional Office (via email)

Yolanda Pon, Solid Waste Program Supervisor, Public Health-Seattle & King County

Kathryn McPherson, Solid Waste Enforcement Investigator, Washington Utilities and Transportation Commission

Justin Gough, Operations and Logistics Manager, Ridwell