



Snohomish County
Public Works
Solid Waste Division

Aaron Reardon
County Executive

(425) 388-3425
FAX (425) 388-7044

3000 Rockefeller Avenue, M/S 607
Everett, WA 98201

July 30, 2009

David W. Danner, Director and Executive Secretary
Washington State Utilities and Transportation Commission
Attention: Gene Eckhardt, Assistant Director
P.O. Box 47250
Olympia, Washington 98504-7250

RECEIVED
RECORDS MANAGEMENT
2009 AUG -3 AM 8:02
STATE OF WASH.
UTIL AND TRANSP.
COMMISSION

RE: Docket T6-090777

Dear Mr. Danner:

The purpose of this letter is to convey Snohomish County's support for extending Allied Waste Services of Lynnwood's Recycling and Revenue Sharing Plan for the period of September 1, 2009 through August 31, 2010. Snohomish County recommends that the Washington State Utilities and Transportation Commission (WUTC) allow Allied Waste (AW) to retain the maximum thirty percent of revenues allowed by statute.

Over the last year, AW has closely coordinated with Snohomish County Solid Waste on the activities outlined in the previous year's agreement. While a challenging time due to the economy and markets, significant efforts were undertaken as outlined in the agreement and AW has done a good job. AW will be providing you a packet of documents and samples of some of the activities undertaken. Several activities were not fully implemented, such as advising our station staff on loads rich in recyclables. These activities were delayed by mutual agreement and will be pursued in the future.

AW and Snohomish County have worked together to prepare a new revenue sharing agreement. Snohomish County recommends that WUTC approve this agreement, which extends revenue sharing at the 30% level until August 31, 2010. If AW does not meet its reporting requirements, the amendment calls for a 50% reduction in the revenue share retained by AW. If AW does not meet other conditions in the amended Plan, Snohomish County may later request that the WUTC consider requiring that some revenues be returned to customers.

In my position as the Solid Waste Division Director, I have been delegated the authority to make the certification of revenue sharing plan as required in RCW 81.77.185 statute. I hereby certify

that the plan submitted to you by Allied Waste Services of Lynnwood is consistent with our local solid waste plan.

Thank you for the opportunity to provide this letter of certification and recommendation for the extension of AW recycling plan. If you have any questions, please contact Seggo Jackson, Principal Planner, at 425-388-6490, or sego.jackson@co.snohomish.wa.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Zybas', written over a horizontal line.

Matt Zybas

Solid Waste Division Director

Copy: Jeff Borgida, Allied Waste Services of Lynnwood
Seggo Jackson, Principal Planner
File

Allied Waste Services of Lynnwood Recycling and Commodity Revenue Sharing Plan for Snohomish County September 1, 2009 - August 31, 2010.

This is the Allied Waste Services of Lynnwood Recycling and Commodity Revenue Sharing Plan for Snohomish County ("Plan"). As authorized by RCW 81.77.185, Allied Waste Services of Lynnwood ("AW") is seeking approval from the Washington Utilities and Transportation Commission ("WUTC") to continue retaining 30% of the commodity value revenues for the 2009 plan year (September 1, 2009 through August 31, 2010). The Agreement contained in this plan has been developed in partnership with Snohomish County ("County") with the expressed intent of increasing recycling from WUTC residential customers serviced by AW.

It is the intention of both parties that this program be continued in 2010 and beyond, subject to modification by mutual agreement. A new agreement for the 2010 plan year (September 1, 2010 through August 31, 2011) will be negotiated and agreed to by July 1, 2010, if both parties agree that a continued agreement is in the best interests of ratepayers and the environment.

If a new agreement is not negotiated by July 1, 2010, the Agreement may be terminated, requiring the development of a new Base Agreement.

Data Reporting

AW will provide accurate monthly recycling and disposal reports using the format required by the County on a timely basis. The parties agree that failure to meet this condition on the part of AW will result in a 50% reduction in the amount of revenues that would otherwise be retained by AW.

Quarterly Updates and Coordination Meetings

AW will continue to meet with County planning staff quarterly to report on implementation steps undertaken as per this agreement, lessons learned, and proposed next steps. Memorandums, reports, promotional materials and other requirements described in this amendment will be provided in advance of these meetings. During these meetings, AW and County staff will also discuss concepts, plans and implementation mechanisms designed to, in the long-term, significantly affect the nature and/or quantity of recyclables and wastes collected in Snohomish County. Subjects to be addressed, in addition to other elements outlined in this agreement, include but are not limited to:

- Educational materials to encourage residents to buy recycled products, including invoice messaging and inserts.
- Multi-Family Recycling Education Program. AW will discuss with the County in the Quarterly Update and Coordination Meetings potential ways

in which AW can be more engaged in the promotion and education of Multi-Family Recycling in preparation for the 2010 Revenue Sharing Agreement. The goal of these discussions is to improve the quality and quantity of materials being recycled by multi-family customers.

Promotion of Recycling Programs

AW will promote its recycling programs throughout Snohomish County through a variety of public outreach efforts, including web-based information, bill inserts, media outreach, labeling of containers and carts, etc. AW will maintain up-to-date program information and instructions on its website. AW will make available recycling instructions in a multi-lingual format and will promote the availability of multi-lingual information to the appropriate communities. AW will seek input from the County when creating or revising these materials. This effort will be designed to help ensure that a common message is used throughout Snohomish County to increase recycling efforts.

AW will develop and continue to incorporate messaging related to green house gas reduction and climate change issues with regard to increased reuse and recycling. AW will seek input from the County when developing these messages.

Increase Proportion of Households Subscribing to Curbside Collection Services

AW will assess results from its efforts to increase the proportion of households subscribing to curbside collection services undertaken under the previous agreement. AW will discuss the results and continue or revise its strategy as it continues to work to increase use of curbside collection services.

Decrease Residuals and Contaminants

AW will continue to minimize the amount of non-recyclable residual received at its processing facility(ies) and will evaluate and monitor contamination of commodities (such as glass and plastic in paper), to increase the proportion recycled of incoming material. AW will analyze the results of the Recycling Audit conducted by Green Solutions as part of the previous agreement and will share its conclusions with the County in a memo by January 1, 2010.

Harmonization with Other Area Curbside Recycling Programs

AW will examine the materials collected in other Puget Sound area programs and will recommend which of these materials could be collected in Snohomish County and which materials it would advise against. These recommendations will be discussed in a quarterly meeting in time for revisions to be made in the next distribution of recycling instructions.

Targeted Commodities

Due to green house gas emission impacts and other environmental benefits, AW will target efforts to increase the recycling of all metals, paper and biogenic

organics. This includes increasing promotion of small metals collected at curbside.

AW will work with the County to develop and refine a system to identify roll-off loads with significant contaminants and/or a high degree of recyclable materials. AW drivers will abide by a 50/50 rule (50% recyclables to 50% garbage) and notify Snohomish County transfer station staff so that the load may be segregated. This activity was required in the previous agreement but was delayed due to the economic downturn and resulting commodity markets as well as SWD staff reductions. It is anticipated that this system will be mutually developed and implemented by early 2010.

AW will report to the County by April 2010, regarding activities in pursuit of these goals.

E-Waste, Problematic and Household Hazardous Waste

The purpose of this activity is to ensure high diversion of problematic and hazardous materials in the waste stream and to assist customers in accessing and benefiting from newly emerging programs such as e-waste recycling.

AW will continue to implement an educational program to educate its customers on ways to properly recycle/dispose of E-Waste and household hazardous waste by:

- Distributing updated information to AW call center staff access information on locations and services for electronic waste, other problematic materials, and household hazardous waste.
- Include in its information mailers reference to websites and phone numbers where Snohomish county residents and businesses can access information on locations and services for electronic waste, other problematic materials, and household hazardous waste.
- Reexamine if AW will provide any collection or drop off services for e-waste in the new electronics recycling system which began in 2009, and if so develop a plan in coordination with SWD that will impose costs (if any) on the entity utilizing the service rather than that cost being spread across all rate payers. If a plan is developed, SWD encourages AW to utilize a processor and manufacturer plan that utilizes the "preferred" level of performance standard.
- Determine and implement activities, such as use of dumpster decals, to better inform residential and commercial customers of proper recycling and disposal regulations.

- Implement a program, in cooperation with the Solid Waste Division, to better inform customers of the ban on the disposal of fluorescent lamps, including handling instructions and recycling options.

Organics Collection

AW will continue to take the lead and work cooperatively with Snohomish County to promote the food waste service to all AW single-family customers. AW will utilize bill inserts, brochures or other public education mechanisms, including direct mail, to provide information to all residential customers regarding food waste and Yard waste programs. AW will access the results of its efforts in the previous agreement and will discuss next steps with the County.

AW will annually coordinate with Cedar Grove Compost, or any other permitted compost facility receiving curbside organics, to:

- Confirm materials that can be received and properly composted at the facility;
- Determine key contaminants and what might be done to minimize these contaminants;
- Determine new materials that might be added to the program; and
- Discuss any other operational matters beneficial to customers, the County, and the environment.

Results of discussions will be summarized in a memorandum to the County by January 1, 2010.

AW will explore ways to determine decreases in disposal poundage and increases in organics poundage that result from the addition of food and other organic materials to the yard waste program and that can be used to gauge the success and impact of the program. AW will include input from the County on possible methods and provide written results of any assessments undertaken.

Planning for Possible Future Transition to Every-other-week/Weekly Recycling, Weekly Organics, Every-other-week Garbage

AW will develop a draft outline, including steps to be undertaken and realistic schedule, for the possible transition from the current set of services to every-other-week garbage service provided universally and combined with every-other-week or weekly recycling and weekly organics collection. The draft will serve as a basis of discussion with the Division during quarterly meetings, and will be provided prior to the first quarterly meeting in 2010.

Deliverables and Timeline

Activity:	Date Due:
Data Reporting /Monthly Reporting	last day of following month
Coordination Meetings and Quarterly, Updates	beginning Q4 2009
Promotion of Recycling Programs	Ongoing, instructions circulated at least once per year
Recycling Audit Analysis	Q4 2009 meeting
Harmonization with other area programs	Q4 2009 meeting
Formalize a plan to improve communications between Allied Waste's commercial drivers and County transfer station employees	Q1 2010
Florescent Lamp education program	Q1 2010
Updated communications with Composters	January 1, 2010
Outline for transition to EOW garbage	Q1 2010 with discussion to follow
Negotiate new Agreement	July 1, 2010

County Reporting to the WUTC

If all of the goals and program components specified in this plan are achieved, the County agrees to provide a written recommendation to the WUTC that AW will retain 30% of Allied Waste and Snohomish County Revenue Sharing Plan (2009-2010) commodity values, for the September 1, 2009 August 31, 2010 period.

If the Data Reporting requirement of this Agreement is not met the parties agree that AW will retain no more than 50% of the total commodity values during this period and a revenue sharing agreement for September 1, 2009 August 31, 2010 will not be signed until all required data is submitted.

Recycling Goals


The goal of this agreement is to increase recycling levels of AW customers. AW and Snohomish County will use available data and data required by this agreement to monitor changes in recycling and or garbage levels. As a result of the programs, activities, and infrastructure improvements implemented by AW and associated with the ongoing series of revenue sharing agreements and addenda, the parties expect to maintain the recycling levels achieved, increase organics recycling as a result of adding food waste to yard waste services, and to improve the quality of materials recycled by residential customers.

Continued Cooperation

In addition to the provisions of the Plan and the Addendums, the County and AW agree to continue to look for means of diverting material away from landfill disposal and increasing the number of residential customers it services through its curbside collection programs. The County and AW further agree to negotiate in good faith enhancements to the recycling services being provided by AW.

Allied Waste Authorized Representative

Date



7/29/09

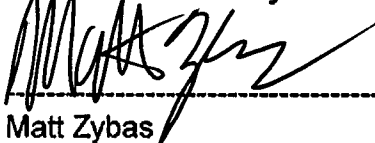
Jeff Borgida
General Manager, Allied Waste Services of Lynnwood

SNOHOMISH COUNTY CERTIFICATION

With this acknowledgement, Snohomish County hereby certifies this Recycling Plan is consistent with the County's Comprehensive Solid Waste Management Plan and the County's understanding of RCW 8 1.77.185.

Snohomish County Authorized Representative

Date



7/31/09

Matt Zybas
Director, Snohomish County Solid Waste Division