

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of:  
  
WASTE MANAGEMENT OF WASHINGTON,  
INC. D/B/A WM HEALTHCARE SOLUTIONS  
OF WASHINGTON  
  
For an Extension of Certificate G-237 for a  
Certificate of Public Convenience and Necessity  
to Operate Motor Vehicles in Furnishing Solid  
Waste Collection Service

Docket No. TG-120033

**DECLARATION OF POLLY L.  
McNEILL IN SUPPORT OF WASTE  
MANAGEMENT'S MOTION TO  
COMPEL DISCOVERY FROM  
STERICYCLE**

I, Polly L. McNeill, declare as follows:

1. I am counsel for Waste Management in this matter and I make this declaration based on personal knowledge.
2. Attached hereto as Exhibit 1 is a true and correct copy of Data Requests Propounded to Stericycle by Waste Management and Stericycle's Objections and Responses Thereto dated June 29, 2012, together with excerpts of exhibits attached thereto.
3. Attached hereto as Exhibit 2 is a true and correct copy of Jessica L. Goldman's letter to Stephen B. Johnson dated July 17, 2012.
4. Attached hereto as Exhibit 3 is a true and correct copy of Stephen B. Johnson's letter to Jessica Goldman dated July 19, 2012.
5. Attached hereto as Exhibit 4 is a true and correct copy of Jessica L. Goldman's letter to Stephen B. Johnson dated July 24, 2012.


1           6.       Attached hereto as Exhibit 5 is a true and correct copy of Stericycle's Supplemental  
2 Responses to Waste Management's Data Requests dated July 27, 2012.

3           7.       Attached hereto as Exhibit 6 are true and correct excerpts of Waste Management's  
4 Opening Brief on Preliminary Legal Issue dated June 14, 2012.

5           8.       Attached hereto as Exhibit 7 is a true and correct copy of a July 6, 2010 Department of  
6 Ecology letter to Stericycle, Inc. Morton attaching a Notice to Comply which Waste Management  
7 obtained from the Department of Ecology in response to a public records request.

8           I declare under penalty of perjury under the laws of the State of Washington and the United  
9 States that the foregoing is true and correct.

10          EXECUTED this 31st day of July, 2012 at Seattle, Washington.

11  
12   
13 \_\_\_\_\_  
14 Polly L. McNeill

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method indicated below, pursuant to WAC 480-07-150.

<p>Washington Utilities and Transportation Commission  1300 S. Evergreen Park Dr. SW  PO Box 47250  Olympia, WA 98504-7250  360-664-1160  records@utc.wa.gov</p>	<p><input type="checkbox"/> Via Legal Messenger  <input type="checkbox"/> Via Facsimile  <input checked="" type="checkbox"/> Via Federal Express  <input checked="" type="checkbox"/> Via Email</p>
<p>Gregory J. Kopta  Administrative Law Judge  Washington Utilities and Transportation Commission  gkopta@utc.wa.gov</p>	<p><input type="checkbox"/> Via Legal Messenger  <input type="checkbox"/> Via Facsimile  <input type="checkbox"/> Via U.S. Mail  <input checked="" type="checkbox"/> Via Email</p>
<p>Fronda Woods  Attorney General's Office of Washington  PO Box 40128  Olympia, WA 98504  (360) 664-1225  fwoods@utc.wa.gov  bdemarco@utc.wa.gov</p>	<p><input type="checkbox"/> Via Legal Messenger  <input type="checkbox"/> Via Facsimile  <input type="checkbox"/> Via U.S. Mail  <input checked="" type="checkbox"/> Via Email</p>
<p>Stephen B. Johnson  Jared Van Kirk  Garvey Schubert Barer  1191 Second Avenue, Suite 1800  Seattle, WA 98101  (206) 464-3939  sjohnson@gsblaw.com  jvankirk@gsblaw.com  vowen@gsblaw.com  dbarrientes@gsblaw.com  Attorneys for Stericycle of Washington, Inc.</p>	<p><input type="checkbox"/> Via Legal Messenger  <input type="checkbox"/> Via Facsimile  <input type="checkbox"/> Via U.S. Mail  <input checked="" type="checkbox"/> Via Email</p>
<p>James K. Sells  3110 Judson Street  Gig Harbor, WA 98335  (360) 981-0168  jamesells@comcast.net  cheryls@rsulaw.com  Attorney for Protestant WRRRA, Rubatino, Consolidated,  Murrey's, and Pullman</p>	<p><input type="checkbox"/> Via Legal Messenger  <input type="checkbox"/> Via Facsimile  <input type="checkbox"/> Via U.S. Mail  <input checked="" type="checkbox"/> Via Email</p>

DATED at Seattle, Washington, this 31st day of July, 2012.

  
Deanna L. Schow

# Exhibit 1



RECEIVED  
2012 JUN 29 PM 4:41  
SUMMIT LAW GROUP P.L.L.C.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of:

Docket No. TG-120033

WASTE MANAGEMENT OF WASHINGTON,  
INC. D/B/A WM HEALTHCARE SOLUTIONS  
OF WASHINGTON

**DATA REQUESTS PROPOUNDED  
TO STERICYCLE BY WASTE  
MANAGEMENT AND  
STERICYCLE'S OBJECTIONS AND  
RESPONSES THERETO**

For an Extension of Certificate G-237 for a  
Certificate of Public Convenience and Necessity  
to Operate Motor Vehicles in Furnishing Solid  
Waste Collection Service

TO: Protestant Stericycle of Washington, Inc. and its attorneys Steven B. Johnson and Jared  
Van Kirk

Pursuant to WAC 480-07-405 and the Prehearing Conference Order, Waste  
Management of Washington, Inc. requests that you answer fully and in writing each of the  
following Data requests and produce the following-described documents within your  
possession, custody or control at the offices of Summit Law Group, 315 5<sup>th</sup> Avenue S, Ste.  
1000, Seattle, WA 98104, by June 7, 2012. The terms "you" and "yours" refer to Stericycle of  
Washington, Inc. and its agents, employees, officers, directors, and owners. The term  
"document" means writings, drawings, graphs, charts, photographs, and any other data  
compilation. If you claim a privilege against production of any document, please state the  
asserted basis of the privilege and describe such document with sufficient specificity to enable

DATA REQUESTS PROPOUNDED TO STERICYCLE BY  
WASTE MANAGEMENT AND STERICYCLE'S  
OBJECTIONS AND RESPONSES THERETO -Page 1

GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS  
*eighteenth floor*  
*1191 second avenue*  
*seattle, washington 98101-2939*  
*206 464 3939*

1 Waste Management to frame a motion to compel disclosure. Pursuant to WAC 480-07-  
2 405(7)(c), as to each data response, state the name of the person who prepared the response and  
3 the name of any witness who is knowledgeable about and can respond to questions concerning  
4 the response.

5 **DATA REQUEST NO. 1:** Produce a detailed general ledger for your Washington  
6 operations for calendar year 2011.

7 **RESPONSE:** Stericycle objects to this request on the grounds that it is overbroad and  
8 unreasonably burdensome and seeks information that is neither relevant to this proceeding nor  
9 reasonably calculated to lead to the discovery of relevant, admissible evidence. A general  
10 ledger records every item of expense and revenue, would involve many hundreds (perhaps  
11 thousands) of pages in written form and would disclose all of Stericycle's vendors and other  
12 payees and every amount paid to them, as well as all of Stericycle's customers and every  
13 payment received from each of them. Stericycle does not maintain a detailed general ledger for  
14 its Washington operations and would have to create such a detailed general ledger from data  
15 maintained on a regional basis. The burden and expense of creating such general ledger  
16 information for Stericycle's Washington operations would be substantial and is not warranted  
17 by any reasonable need by Waste Management for such information in the detail requested.  
18 Stericycle further objects to this request because it seeks confidential and proprietary business  
19 information and is propounded for the improper purpose of gaining competitive advantage in  
20 the marketplace. Summary data concerning Stericycle's costs and revenues are contained in  
21 the annual reports Stericycle has filed with the Commission and are available to Waste  
22 Management from that source. Without waiving the foregoing objections, Stericycle provides  
23 the additional expense and revenue data shown on Exhibit DR#1 produced herewith for its  
24 regulated services in calendar year 2011. Persons with knowledge: Nanette Walker, John  
25 Suchla, Mike Philpott.  
26

1 **DATA REQUEST NO. 2:** Provide a detailed revenue price-out (explaining the basis  
2 for your WUTC revenues) for calendar years 2009, 2010, 2011, and 2012 (to date) respectively,  
3 including the volume of each size container you collected in each year, the number of  
4 customers for each size container in each year, and the rate you charged for each such  
5 collection in each year.

6 **RESPONSE:** Stericycle objects to this request on the grounds that it is vague,  
7 overbroad and unreasonably burdensome and seeks information that is neither relevant to this  
8 proceeding nor reasonably calculated to lead to the discovery of relevant, admissible evidence.  
9 The term "revenue price-out" is undefined. Counsel for Stericycle requested a meeting with  
10 counsel for Waste Management to clarify Waste Management's data requests but was advised  
11 that such a meeting was unnecessary in light of the guidance received from the Administrative  
12 Law Judge with respect to these matters. This data request is unduly burdensome in that the  
13 requested "revenue price-out" does not exist and, to the extent Stericycle could guess what is  
14 intended, would in all events require a costly and time-intensive analysis of Stericycle billing  
15 data that is not warranted by any reasonable need by Waste Management for the information  
16 requested. This is not a proceeding to evaluate Stericycle's rates. Without waiving the  
17 foregoing objections, Stericycle advises that it handled the number of containers and pounds of  
18 waste and earned the revenues indicated below from its WUTC-regulated services in 2011 and  
19 2012 through May 31:

	<u>No. of containers</u>	<u>Pounds</u>	<u>Revenues</u>
20 2011	486,268	11,576,844	\$13,709,428
21 2012 (5/31)	188,750	4,716,283	\$5,544,756

22  
23 **Persons with knowledge:** Mike Philpott, John Suchla.

24 **DATA REQUEST NO. 3:** Produce a detailed depreciation schedule listing all assets  
25 used to provide WUTC-regulated biomedical services in Washington.  
26

1           **RESPONSE:** Stericycle objects to this data request to the extent that a “detailed  
2 depreciation schedule” seeks information at a level of detail that is unreasonably burdensome  
3 and seeks information at a level of detail that is neither relevant to this proceeding nor  
4 reasonably calculated to lead to the discovery of relevant, admissible evidence. Without  
5 waiving its objections, Stericycle provides a depreciation schedule in reasonable detail as set  
6 forth in Exhibit DR#3 produced herewith. Persons with knowledge: Mike Philpott, John  
7 Suchla, Nanette Walker.

8           **DATA REQUEST NO. 4:** Describe specifically the methodology used to determine  
9 any overhead charges to your WUTC-regulated biomedical waste operation. For all overhead  
10 allocations, provide calculations in electronic format supporting the methodology.

11           **RESPONSE:** Stericycle allocates corporate overhead costs to its regulated services as  
12 a percentage of its regulated service revenue, determined by dividing Stericycle, Inc.’s  
13 consolidated total SG&A medical waste expenses by its consolidated total medical waste  
14 revenues. In 2011, this percentage was 6.933%. Persons with knowledge: Nanette Walker.

15           **DATA REQUEST NO. 5:** Describe specifically the methodology and allocation  
16 factors you use to separate common expenses for WUTC-regulated and other, non-regulated  
17 operations.

18           **RESPONSE:** Stericycle allocates common expenses between its WUTC-regulated and  
19 non-WUTC-regulated services by first determining the percentage of revenues, containers  
20 handled and truck stops allocable to Washington customers and then allocating each expense  
21 item in that percentage, based on the most relevant relationship. Information with respect to  
22 the allocation methodology used for particular expense categories is set forth in Exhibit DR#1.  
23 Persons with knowledge: Nanette Walker.

24           **DATA REQUEST NO. 6:** Identify any persons or entities which have an affiliated  
25 interest (as that term is defined in RCW 80.16.010) with your regulated biomedical operations.

26           **RESPONSE:** Stericycle, Inc. Persons with knowledge: Mike Philpott.



1           **DATA REQUEST NO. 7:** Produce contracts and any other documents reflecting  
2 arrangements or transactions between you and any affiliated interest (as that term is defined in  
3 RCW 80.16.010). If no documents are available, state a summary of the services provided and  
4 the prices or values paid.

5           **RESPONSE:** Stericycle, Inc. charges Stericycle for processing and disposal of waste  
6 collected from Washington generators. The amount charged annually is the percentage of the  
7 total costs of Stericycle, Inc.'s Morton plant equal to the percentage of the waste processed at  
8 Morton that is collected from Washington customers. Persons with knowledge: Nanette  
9 Walker, John Suchla.

10           **DATA REQUEST NO. 8:** Produce your WUTC annual reports for 1995, 2001, 2009,  
11 2010, and 2011.

12           **RESPONSE:** See WUTC annual reports for 2001, 2009, 2010 and 2011 produced  
13 herewith at Exhibit DR#8. Stericycle is unable to locate a copy of its 1995 WUTC annual  
14 report but it should be available to Waste Management from the Commission.

15           **DATA REQUEST NO. 9:** State the proportion or amounts of the rates currently  
16 charged under your Tariff No. 1 which relate to the cost of processing biomedical waste at your  
17 affiliated processing facility in Morton, Washington.

18           **RESPONSE:** In 2011, processing and disposal costs were 41% of Stericycle's tariff  
19 revenues, as shown on Stericycle's 2011 annual report to the Commission.

20           **DATA REQUEST NO. 10:** Produce the income statements for your affiliated  
21 processing facility in Morton, Washington for 2009, 2010, 2011, and 2012 (to date).

22           **RESPONSE:** Stericycle objects to this data request on the grounds that the information  
23 sought is irrelevant to the issues in this proceeding and is not reasonably calculated to lead to  
24 the discovery of relevant, admissible evidence. Stericycle further objects to this data request on  
25 the grounds that it is unreasonably burdensome and seeks confidential and proprietary  
26 information for an improper competitive purpose. Stericycle, Inc. is not a party to this

1 proceeding. Stericycle, Inc. does not prepare an income statement for the Morton plant in the  
2 ordinary course of its business, so the preparation of an income statement for any year would  
3 require an expenditure of accounting time and effort that is not justified by any legitimate need  
4 of Waste Management for the information requested. Amounts paid by Stericycle for treatment  
5 and disposal of waste collected in its regulated service are disclosed in Stericycle's annual  
6 reports to the Commission and that should be sufficient for purposes of this proceeding.

7 **DATA REQUEST NO. 11:** State how much your labor, fuel and other operational  
8 costs have increased since your Tariff No. 1 was initially adopted and describe specifically  
9 your method for deriving the amount of the increases.

10 **RESPONSE:** Stericycle does not have labor, fuel or other operational cost data for its  
11 initial operations under Tariff No. 1 so is unable to provide the requested information. General  
12 information concerning cost changes affecting Stericycle are available to Waste Management  
13 from Stericycle's annual reports to the Commission. Information about changes in costs  
14 affecting medical waste collection generally are available from published sources. Persons  
15 with knowledge: Mike Philpott.

16 **DATA REQUEST NO. 12:** State why you have never filed a change in base service  
17 rates.

18 **RESPONSE:** Business considerations. Persons with knowledge: Mike Philpott.

19 **DATA REQUEST NO. 13:** Provide a detailed comparison of rates for services under  
20 your Tariff No. 1 to rates for similar services in Oregon, California, and Idaho.

21 **RESPONSE:** Stericycle objects to this data request on the grounds that the information  
22 sought is irrelevant to this proceeding and is not reasonably calculated to lead to the discovery  
23 of relevant, admissible evidence. Stericycle further objects to this request because it seeks  
24 confidential and proprietary business information and is propounded for the improper purpose  
25 of gaining competitive advantage in markets outside Washington.

1           **DATA REQUEST NO. 14:** State the volume of biomedical waste you collected in  
2 Washington in 1995, 2001, 2009, 2010, 2011, and 2012 (to date), respectively.

3           **RESPONSE:** The volume of biomedical waste collected by Stericycle from  
4 Washington customers in 2011 and 2012 through May 31 is shown in Stericycle's response to  
5 Data Request No. 2. Stericycle objects to this data request to the extent it requests data for  
6 prior years on the grounds that the request is unreasonably burdensome and that the information  
7 sought is irrelevant to this proceeding and is not reasonably calculated to lead to the discovery  
8 of relevant, admissible evidence.

9           **DATA REQUEST NO. 15:** State the volume of biomedical waste you collected in  
10 Washington in 2009, 2010, 2011, and 2012 (to date), respectively, which waste was generated  
11 in territory where you were the only service provider.

12           **RESPONSE:** Stericycle objects to this data request on the grounds that it is vague,  
13 ambiguous, unreasonably burdensome and seeks information that is neither relevant to this  
14 proceeding nor reasonably calculated to lead to the discovery of relevant, admissible evidence.  
15 Counsel for Stericycle requested a meeting with counsel for Waste Management to clarify  
16 Waste Management's data requests but was advised that such a meeting was unnecessary in  
17 light of the guidance received from the Administrative Law Judge with respect to these matters.  
18 Without waiving the foregoing objections, Stericycle responds further as follows: Under the  
19 Commission's ruling in Stericycle's complaint case against Waste Management in 2011, all G-  
20 certificate holders are authorized to provide biomedical waste collection services, could have  
21 done so at any time and therefore must be considered "service providers" within their  
22 territories. Stericycle is not familiar with the scope of the services provided by each of the  
23 holders of general solid waste authority or the precise territories covered by their G-certificates.  
24 Waste Management's own authority is irregular and covers portions of certain cities and  
25 counties. Without detailed analysis of Waste Management's service territory and the service  
26 territories of other G-certificate holders, Stericycle does not have sufficient information to

1 determine the exact boundaries of “the territory” referenced in this data request, nor to calculate  
2 the volume of waste it handled in that territory during those time periods. See also Stericycle’s  
3 objections to Data Request No. 16 below, incorporated herein by this reference. Persons with  
4 knowledge: Mike Philpott.

5 **DATA REQUEST NO. 16:** State the volume of biomedical waste you collected, and  
6 the number of customers from whom you collected such waste, within each Washington  
7 county, respectively, in 1995, 2001, 2009, 2010, 2011, and 2012 (to date), respectively.

8 **RESPONSE:** Stericycle objects to this data request on the grounds that it is  
9 unreasonably burdensome and seeks information that is neither relevant to this proceeding nor  
10 reasonably calculated to lead to the discovery of relevant, admissible evidence. Stericycle  
11 does not collect its customer data or waste collection data by county. Stericycle further objects  
12 to this data request because it seeks confidential and proprietary business information and is  
13 propounded for the improper purpose of gaining competitive advantage in the marketplace.  
14 Without waiving its objections, Stericycle advises that Stericycle has served and continues to  
15 offer its services to customers throughout Washington state. Persons with knowledge: Mike  
16 Philpott.

17 **DATA REQUEST NO. 17:** Identify by name and address each facility to which you  
18 transported or arranged to have transported biomedical waste generated in Washington in 2009,  
19 2010, 2011, and 2012 (to date), respectively, and as to each such year, identify the volume of  
20 biomedical waste you tendered to each such facility.

21 **RESPONSE:** Stericycle objects to this data request to the extent it requests data for  
22 years prior to 2011 on the grounds that the request is unreasonably burdensome and that the  
23 information sought is irrelevant to this proceeding and is not reasonably calculated to lead to  
24 the discovery of relevant, admissible evidence. Data with respect to 2011 and 2012 (through  
25 5/31) is set out below:  
26



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

	<u>Stericycle, Inc. Morton, WA</u>	<u>Stericycle, Inc. Salt Lake City, UT</u>
2011	10,422,737 lbs.	1,154,107 lbs
2012 (5/31)	4,075,597 lbs.	640,686 lbs.

Persons with knowledge: Mike Philpott.

**DATA REQUEST NO. 18:** State the number of customers you served in Washington in 1995, 2001, 2009, 2010, 2011, and 2012 (to date), respectively.

**RESPONSE:** The number of Stericycle’s customers is shown in Stericycle’s annual reports to the WUTC each year. Annual reports for the years 2001, 2009, 2010 and 2011 are produced herewith. Stericycle is unable to locate its 1995 annual report, although it should be available to Waste Management from the WUTC. The number of Washington customers served by Stericycle in 2012 through May 31 is 7,136.

**DATA REQUEST NO. 19:** State the number of customers for whom you provided services at more than one affiliated facility in Washington in 2009, 2010, 2011, and 2012 (to date), respectively.

**RESPONSE:** Stericycle objects to this data request on the grounds that it is vague and ambiguous. It is unclear whether “affiliated facility” refers to a facility “affiliated” with Stericycle or refers to customers with more than one “affiliated facility.” Counsel for Stericycle requested a meeting with counsel for Waste Management to clarify Waste Management’s data requests but was advised that such a meeting was unnecessary in light of the guidance received from the Administrative Law Judge with respect to these matters. To the extent this data request seeks information about services to customers with multiple locations, Stericycle advises that in 2011 and 2012 it served 66 and 72 customers with multiple pickup locations, respectively. Stericycle objects to this data request to the extent it seeks data for years prior to 2011 on the grounds that it is unreasonably burdensome and seeks information

1 that is neither relevant to this proceeding nor reasonably calculated to lead to the discovery of  
2 relevant, admissible evidence. Persons with knowledge: James Ryan.

3 **DATA REQUEST NO. 20:** Produce all documents which discuss, refer to or reflect a  
4 customer complaint made to you or about your service since January 1, 2009.

5 **RESPONSE:** Stericycle has no documents in its possession or control that discuss,  
6 refer to or reflect "customer complaints" since January 1, 2009. The WUTC keeps records of  
7 "customer complaints" concerning solid waste collection companies that it receives and these  
8 records are available to Waste Management by means of a public records request. Persons with  
9 knowledge: Mike Philpott.

10 **DATA REQUEST NO. 21:** Produce all documents which discuss, refer to or reflect a  
11 customer complaint made about service at your affiliated processing facility in Morton,  
12 Washington since January 1, 2009.

13 **RESPONSE:** Stericycle has no documents that discuss, refer to or reflect a "customer  
14 complaint" about service at the Morton processing facility. The WUTC keeps records of  
15 "customer complaints" concerning solid waste collection companies that it receives and these  
16 records are available to Waste Management by means of a public records request. Persons with  
17 knowledge: Mike Philpott.

18 **DATA REQUEST NO. 22:** Produce all documents which discuss, refer to or reflect  
19 your violation, alleged violation, or investigation of a possible violation, of any law, regulation,  
20 ordinance, or government rule since January 1, 2009 in performing WUTC-regulated collection  
21 services. Produce the same from operating your affiliated processing facility in Morton,  
22 Washington.

23 **RESPONSE:** Stericycle objects to this data request on the grounds that it is  
24 unreasonably burdensome and seeks information that is neither relevant to this proceeding nor  
25 reasonably calculated to lead to the discovery of relevant, admissible evidence to the extent it  
26 seeks documents or records related to the minor citations listed on Exhibit DR#22, produced

1 herewith; to roadside vehicle inspections that did not result in citations; or to Stericycle, Inc.'s  
2 processing facility. Stericycle further objects to this data request to the extent that it could be  
3 interpreted to cover Stericycle's communications with legal counsel on the grounds that subject  
4 communications are confidential and privileged. Persons with knowledge: Mike Philpott.

5 **DATA REQUEST NO. 23:** Produce all documents which discuss, refer to or reflect  
6 your efforts to make your services known and to attract business throughout Washington since  
7 January 1, 2009 including, without limitation, copies of all yellow pages advertising.

8 **RESPONSE:** Stericycle has an internet website that can be viewed at  
9 [www.stericycle.com](http://www.stericycle.com). A copy of an advertisement placed in the 2010-2011 directory of the  
10 Washington Medical Association is produced herewith as Exhibit DR#23-1. Copies of  
11 brochures and other marketing materials used by Stericycle marketing and sales personnel at  
12 tradeshows and in calls on individual medical waste generators are produced as Exhibit DR#23-  
13 2. A copy of Stericycle's Marketing Agreement with Washington Health Services, an affiliate  
14 of the Washington State Hospital Association, is produced as Exhibit DR#23-3. Persons with  
15 knowledge: Mike Philpott, Ron Adams.

16 **DATA REQUEST NO. 24:** Describe the containers you provide to your customers to  
17 serve as repositories of biomedical waste including, without limitation, stating the sizes of the  
18 containers, the manufacturers of the containers, how long you have been using the containers,  
19 and where in Washington you provide each such container to customers.

20 **RESPONSE:** Stericycle objects to this data request on the grounds that it is  
21 unreasonably burdensome and seeks information that is neither relevant to this proceeding nor  
22 reasonably calculated to lead to the discovery of relevant, admissible evidence. Without  
23 waiving its objections, Stericycle responds that the containers it currently uses in providing  
24 regulated service in Washington are described in its Tariff No. 1 and that all containers it  
25 previously used were similarly described in Tariff No. 1, as in effect from time to time. All  
26 containers described in Tariff No. 1 have been made available to Stericycle customers




1 throughout the state of Washington in accordance with customer requests. The length of time  
2 Stericycle has used each such container generally corresponds to the period of time when that  
3 container was described in Tariff No. 1. Stericycle has not retained copies of its Tariff No. 1,  
4 as in effect in years prior to 2012. However, copies of Stericycle's Tariff No. 1, as currently in  
5 effect and as in effect in prior years, should be available to Waste Management from the  
6 WUTC by means of a public records request. Manufacturers of Stericycle's containers include  
7 Xten Industries, Snyder Industries (formerly Rotonics), Grainger (Rubbermaid), Rehrig Pacific,  
8 Bondtech (Schaefer), Macro Plastics, OTTO Environmental, Hedstrom, RockTenn and  
9 International Paper. Persons with knowledge: Mike Philpott.

10 **DATA REQUEST NO. 25:** Describe if, and how, you recycled biomedical waste in  
11 Washington in 2009, 2010, 2011, and 2012 (to date), respectively.

12 **RESPONSE:** Stericycle offers reusable containers to its customers, including reusable  
13 sharps containers. Sharps containers are typically treated as biomedical waste by other carriers,  
14 including Waste Management. In connection with the processing of sharps waste at its Morton  
15 plant, Stericycle, Inc. cleans, disinfects and returns to Stericycle for reuse all of the reusable  
16 containers Stericycle collects, including reusable sharps containers. Each reusable sharps  
17 container is used up to 600 or more times in Stericycle's sharps waste program. Stericycle's  
18 reusable sharps container program constitutes a highly efficient form of recycling of an item  
19 that is treated as biomedical waste by most providers, including Waste Management. Persons  
20 with knowledge: Mike Philpott.

21 DATED this 29th day of June, 2012.

22 GARVEY SCHUBERT BARER

23  
24 By   
25 Stephen B. Johnson, WSBA #6196  
26 Jared Van Kirk, WSBA #37029  
Attorneys for Protestant Stericycle of  
Washington, Inc.

1 **CERTIFICATE OF SERVICE**

2 I, Vickie L. Owen, certify under penalty of perjury under the laws of the State of  
3 Washington that, on June 29, 2012, I caused to be served on the person(s) listed below in the  
4 manner shown a copy of DATA REQUESTS PROPOUNDED TO STERICYCLE BY WASTE  
5 MANAGEMENT AND STERICYCLE'S OBJECTIONS AND RESPONSES THERETO :


6  
7 Jessica Goldman  
8 Polly L. McNeill  
9 Summit Law Group  
10 315 – 5<sup>th</sup> Avenue South  
11 Seattle, WA 98104  
jessicag@summitlaw.com  
pollym@summitlaw.com  
kathym@summitlaw.com  
deannas@summitlaw.com

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,  
Postage Prepaid
- Via Email

12 James K. Sells  
13 Attorney at Law  
14 PMB 22, 3110 Judson Street  
15 Gig Harbor, WA 98335  
jamesells@comcast.net  
cheryls@rsulaw.com  
*Attorney for Protestant WRRRA, Rubatino,  
16 Consolidated, Murrey's and Pullman*

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,  
Postage Prepaid
- Via Email

17  
18  
19 Dated at Seattle, Washington this 29<sup>th</sup> day of June, 2012.

20  
21   
22 \_\_\_\_\_  
23 Vickie L. Owen  
24 vowen@gsblaw.com  
25  
26

## Exhibit DR #3

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
<b>G/L Asset Acct No = 107005</b>						
014572	Containers	09/15/2004	2,462.61	917.45	144.86	1,062.31
014573	Containers	09/15/2004	29,373.12	10,942.92	1,727.83	12,670.75
014662	Containers	09/15/2004	2,419.24	901.30	142.31	1,043.61
015007	Containers	12/15/2004	55,288.26	19,784.52	3,252.25	23,036.77
015009	Containers	12/15/2004	25,097.21	8,980.89	1,476.31	10,457.20
015037	Containers	12/15/2004	14,351.28	5,135.49	844.19	5,979.68
015147	Containers	01/15/2005	5,673.57	5,673.57	0.00	5,673.57
015168	Containers	01/15/2005	24,444.41	24,444.41	0.00	24,444.41
015203	Containers	02/15/2005	6,508.37	1,925.40	325.42	2,250.82
015205	Containers	02/15/2005	12,646.65	7,482.63	1,264.67	8,747.30
015247	Containers	02/15/2005	11,281.61	3,337.47	564.08	3,901.55
015248	Containers	02/15/2005	12,573.73	7,439.43	1,257.35	8,696.78
015258	Containers	02/15/2005	16,402.05	4,852.26	820.10	5,672.36
015259	Containers	02/15/2005	28,880.98	17,087.92	2,888.10	19,976.02
015338	Containers	03/15/2005	13,766.06	4,015.09	688.30	4,703.39
015340	Containers	03/15/2005	6,921.99	4,037.83	692.20	4,730.03
015383	Containers	03/15/2005	11,550.99	3,369.04	577.55	3,946.59
015384	Containers	03/15/2005	8,362.23	4,877.95	836.22	5,714.17
015386	Containers	03/15/2005	862.69	251.65	43.14	294.79
015387	Containers	03/15/2005	611.06	356.47	61.11	417.58
015453	Containers	04/15/2005	7,546.14	2,169.53	377.31	2,546.84
015454	Containers	04/15/2005	5,701.69	3,278.48	570.17	3,848.65
015459	Containers	04/15/2005	7,263.33	2,088.23	363.17	2,451.40
015460	Containers	04/15/2005	6,588.91	3,788.62	658.89	4,447.51
015475	Containers	04/15/2005	2,984.98	858.19	149.25	1,007.44
015497	Containers	04/15/2005	4,714.25	1,355.34	235.71	1,591.05
015498	Containers	04/15/2005	2,064.68	1,187.20	206.47	1,393.67
015510	Containers	04/15/2005	24,681.13	7,095.84	1,234.06	8,329.90
015511	Containers	04/15/2005	9,873.54	5,677.27	987.35	6,664.62
015606	Containers	04/15/2005	1,200.56	345.17	60.03	405.20
015607	Containers	04/15/2005	621.12	357.13	62.11	419.24
015610	Containers	04/15/2005	3,621.57	1,041.21	181.08	1,222.29
015611	Containers	04/15/2005	1,631.35	938.05	163.14	1,101.19
015910	Containers	08/15/2005	10,879.63	2,946.56	543.98	3,490.54
015911	Containers	08/15/2005	6,347.78	3,438.39	634.78	4,073.17
016161	Containers	09/15/2005	9,947.71	2,652.75	497.39	3,150.14
016162	Containers	09/15/2005	6,727.90	3,588.21	672.79	4,261.00

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
016234	Containers	09/15/2005	2,620.57	1,397.65	262.06	1,659.71
016317	Containers	10/15/2005	837.08	219.71	41.85	261.56
016318	Containers	10/15/2005	988.20	518.80	98.82	617.62
016358	Containers	10/15/2005	3,241.42	850.87	162.07	1,012.94
016359	Containers	10/15/2005	4,276.08	2,244.94	427.61	2,672.55
016439	Containers	11/15/2005	7,721.80	3,989.60	772.18	4,761.78
016441	Containers	11/15/2005	5,747.56	2,969.59	574.76	3,544.35
016904	Containers	12/15/2005	242.42	61.61	12.12	73.73
016905	Containers	12/15/2005	595.57	151.38	29.78	181.16
017167	Containers	01/15/2006	1,481.40	740.70	148.14	888.84
017168	Containers	01/15/2006	449.66	112.40	22.48	134.88
017169	Containers	01/15/2006	448.56	112.15	22.43	134.58
017239	Containers	02/15/2006	15,379.88	15,123.57	256.31	15,379.88
017283	Containers	02/15/2006	6,917.34	1,700.53	345.87	2,046.40
017284	Containers	02/15/2006	4,201.43	2,065.69	420.14	2,485.83
017286	Containers	02/15/2006	19,933.45	4,900.30	996.67	5,896.97
017287	Containers	02/15/2006	9,273.09	4,559.27	927.31	5,486.58
017314	Containers	02/15/2006	7,735.46	1,901.60	386.73	2,288.33
017315	Containers	02/15/2006	5,193.86	2,553.66	519.39	3,073.05
017322	Containers	02/15/2006	16,445.44	8,085.66	1,644.53	9,730.19
017392	Containers	02/15/2006	210.64	51.78	10.53	62.31
017393	Containers	02/15/2006	263.30	64.75	13.17	77.92
017395	Containers	02/15/2006	49.26	12.10	2.46	14.56
017396	Containers	02/15/2006	147.79	36.33	7.39	43.72
017397	Containers	02/15/2006	98.53	24.24	4.93	29.17
017412	Containers	03/15/2006	698.96	337.85	69.90	407.75
017748	Containers	04/15/2006	258.44	122.74	25.83	148.57
018478	Containers	07/15/2006	13,439.35	6,047.73	1,343.94	7,391.67
018605	Containers	07/15/2006	1,375.27	309.42	68.76	378.18
018893	Containers	09/15/2006	236.53	102.49	23.65	126.14
018894	Containers	09/15/2006	114.49	24.83	5.73	30.56
018895	Containers	09/15/2006	195.96	84.93	19.60	104.53
018896	Containers	09/15/2006	314.24	136.16	31.42	167.58
018897	Containers	09/15/2006	391.92	169.82	39.19	209.01
019146	Containers	10/15/2006	13,351.28	2,837.13	667.56	3,504.69
019147	Containers	10/15/2006	5,681.69	2,414.72	568.17	2,982.89
019160	Containers	10/15/2006	5,270.70	1,120.03	263.52	1,383.55
019161	Containers	10/15/2006	1,791.99	761.60	179.20	940.80
019213	Containers	10/15/2006	526.05	111.78	26.30	138.08
019476	Containers	11/15/2006	503.40	104.88	25.17	130.05

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

Sys No	Description	Acquired	Prior Accumulated		Current YTD	Current Accumulated
		Date	Acquired Value	Depreciation		
019477	Containers	11/15/2006	1,973.11	822.12	197.30	1,019.42
019479	Containers	11/15/2006	953.90	198.75	47.70	246.45
019480	Containers	11/15/2006	6,984.16	2,910.08	698.42	3,608.50
019509	Containers	11/15/2006	8,580.95	1,787.71	429.05	2,216.76
019510	Containers	11/15/2006	2,348.38	978.50	234.84	1,213.34
019529	Containers	11/15/2006	13,534.24	2,819.63	676.71	3,496.34
019530	Containers	11/15/2006	3,670.00	1,529.17	367.00	1,896.17
019548	Containers	11/15/2006	193.79	40.38	9.69	50.07
019766	Containers	12/15/2006	4,719.59	963.59	235.98	1,199.57
019767	Containers	12/15/2006	1,519.20	620.34	151.92	772.26
019775	Containers	12/15/2006	844.47	172.40	42.22	214.62
019776	Containers	12/15/2006	2,773.85	1,132.68	277.39	1,410.07
019820	Containers	12/15/2006	859.21	175.42	42.96	218.38
020064	Containers	01/15/2007	797.92	319.16	79.79	398.95
020075	Containers	01/15/2007	4,088.12	817.64	204.41	1,022.05
020076	Containers	01/15/2007	2,034.51	813.80	203.44	1,017.24
020275	Containers	02/15/2007	16,244.54	3,181.23	812.23	3,993.46
020276	Containers	02/15/2007	3,973.92	1,556.45	397.39	1,953.84
020631	Containers	04/15/2007	2,289.18	1,716.90	457.84	2,174.74
020721	Containers	05/15/2007	1,070.32	196.24	53.52	249.76
020722	Containers	05/15/2007	384.97	141.17	38.50	179.67
020770	Containers	05/15/2007	711.55	130.46	35.58	166.04
020771	Containers	05/15/2007	1,873.58	343.49	93.68	437.17
020772	Containers	05/15/2007	1,530.54	561.19	153.05	714.24
020792	Containers	05/15/2007	1,003.58	183.99	50.18	234.17
020794	Containers	05/15/2007	627.63	115.06	31.38	146.44
020993	Containers	06/15/2007	3,880.53	695.27	194.03	889.30
020994	Containers	06/15/2007	818.14	293.16	81.81	374.97
021065	Containers	06/15/2007	773.41	138.57	38.67	177.24
021183	Containers	07/15/2007	4,848.28	848.44	242.41	1,090.85
021184	Containers	07/15/2007	1,118.25	391.40	111.83	503.23
021269	Containers	07/15/2007	2,567.71	449.36	128.39	577.75
021270	Containers	07/15/2007	416.70	145.85	41.67	187.52
021687	Containers	09/15/2007	2,801.67	466.94	140.08	607.02
021688	Containers	09/15/2007	2,452.26	817.43	245.23	1,062.66
021771	Containers	09/15/2007	1,692.52	564.17	169.25	733.42
021915	Containers	10/15/2007	33,334.07	5,416.77	1,666.69	7,083.46
021916	Containers	10/15/2007	8,287.68	2,693.50	828.77	3,522.27
021927	Containers	10/15/2007	4,309.17	700.25	215.45	915.70
021928	Containers	10/15/2007	2,871.50	933.24	287.15	1,220.39



**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
022002	Containers	10/15/2007	18,618.40	12,101.96	3,723.68	15,825.64
022007	Containers	10/15/2007	19,837.06	12,894.08	3,967.41	16,861.49
022090	Containers	11/15/2007	4,248.35	672.66	212.42	885.08
022091	Containers	11/15/2007	1,884.42	596.73	188.44	785.17
022104	Containers	11/15/2007	14,973.91	2,370.87	748.69	3,119.56
022105	Containers	11/15/2007	7,477.85	2,368.00	747.79	3,115.79
022231	Containers	11/15/2007	45,260.25	7,166.20	2,263.01	9,429.21
022232	Containers	11/15/2007	8,793.63	2,784.64	879.36	3,664.00
022234	Containers	11/15/2007	543.99	86.13	27.20	113.33
022236	Containers	11/15/2007	1,302.85	206.28	65.14	271.42
022237	Containers	11/15/2007	805.68	255.14	80.57	335.71
022309	Containers	12/15/2007	869.39	134.02	43.46	177.48
022968	Containers	02/15/2008	4,933.40	719.46	246.67	966.13
022969	Containers	02/15/2008	4,251.91	1,240.14	425.19	1,665.33
022996	Containers	02/15/2008	381.77	55.68	19.09	74.77
022997	Containers	02/15/2008	483.99	141.17	48.40	189.57
023016	Containers	02/15/2008	10,600.42	1,545.89	530.02	2,075.91
023017	Containers	02/15/2008	6,001.41	1,750.41	600.14	2,350.55
023036	Containers	02/15/2008	1,593.44	232.37	79.67	312.04
023037	Containers	02/15/2008	231.72	67.58	23.17	90.75
023058	Containers	02/15/2008	1,276.01	186.08	63.80	249.88
023290	Containers	04/15/2008	10,727.20	1,474.99	536.36	2,011.35
023291	Containers	04/15/2008	1,404.37	386.21	140.44	526.65
023293	Containers	04/15/2008	2,561.20	352.17	128.06	480.23
023294	Containers	04/15/2008	252.34	69.39	25.23	94.62
023518	Containers	05/15/2008	2,462.38	328.32	123.12	451.44
023519	Containers	05/15/2008	454.92	121.30	45.47	166.77
023740	Containers	06/15/2008	1,961.81	253.40	98.09	351.49
023741	Containers	06/15/2008	1,703.51	440.07	170.35	610.42
023755	Containers	06/15/2008	600.82	77.60	30.04	107.64
023756	Containers	06/15/2008	933.94	241.26	93.39	334.65
023867	Containers	07/15/2008	5,370.70	671.35	268.54	939.89
023868	Containers	07/15/2008	1,346.31	336.58	134.63	471.21
023902	Containers	07/15/2008	27,238.96	3,404.87	1,361.95	4,766.82
023903	Containers	07/15/2008	11,256.92	2,814.23	1,125.69	3,939.92
023918	Containers	07/15/2008	534.06	133.52	53.41	186.93
023921	Containers	07/15/2008	639.20	79.90	31.96	111.86
023934	Containers	07/15/2008	5,671.13	708.90	283.56	992.46
023935	Containers	07/15/2008	1,207.51	301.88	120.75	422.63
024165	Containers	08/15/2008	1,090.51	131.78	54.53	186.31

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

Sys No	Description	Acquired		Prior Accumulated		Current YTD	Current Accumulated
		Date	Acquired Value	Depreciation			
024166	Containers	08/15/2008	3,512.45	848.85		351.25	1,200.10
024295	Containers	09/15/2008	23,265.84	2,714.34		1,163.29	3,877.63
024296	Containers	09/15/2008	9,742.96	2,273.37		974.30	3,247.67
024594	Containers	10/15/2008	2,737.65	615.98		273.77	889.75
024730	Containers	11/15/2008	13,899.45	1,505.77		694.97	2,200.74
024731	Containers	11/15/2008	9,760.55	2,114.80		976.06	3,090.86
024733	Containers	11/15/2008	2,361.02	511.55		236.10	747.65
025152	Containers	01/15/2009	6,546.78	654.68		327.34	982.02
025153	Containers	01/15/2009	2,499.03	499.80		249.90	749.70
025305	Containers	02/15/2009	9,476.39	1,816.31		947.64	2,763.95
025423	Containers	03/15/2009	706.24	129.47		70.62	200.09
025903	Containers	05/15/2009	1,576.07	131.34		78.80	210.14
026192	Containers	07/15/2009	1,414.90	106.12		70.75	176.87
026261	Containers	08/15/2009	3,027.63	214.46		151.38	365.84
026262	Containers	08/15/2009	10,273.49	1,455.40		1,027.34	2,482.74
026828	Containers	10/15/2009	3,371.68	210.73		168.58	379.31
026829	Containers	10/15/2009	53,401.64	6,675.20		5,340.16	12,015.36
026852	Containers	10/15/2009	1,995.22	124.69		99.76	224.45
026853	Containers	10/15/2009	553.61	69.20		55.36	124.56
027587	Containers	01/15/2010	1,050.10	52.51		52.51	105.02
027588	Containers	01/15/2010	1,958.15	195.82		195.82	391.64
027960	Containers	02/15/2010	4,141.25	189.81		207.06	396.87
027961	Containers	02/15/2010	1,234.93	113.20		123.49	236.69
029167	Containers	08/15/2010	1,675.96	34.92		83.80	118.72
029479	Containers	09/15/2010	894.99	14.92		44.75	59.67
029904	Containers	12/15/2010	3,396.87	14.15		169.84	183.99
029905	Containers	12/15/2010	2,582.79	21.52		258.28	279.80
029907	Containers	12/15/2010	3,915.89	16.32		195.80	212.12
029908	Containers	12/15/2010	3,439.80	28.67		343.98	372.65
030101	Containers	01/15/2011	4,499.12	0.00		224.96	224.96
030102	Containers	01/15/2011	2,100.51	0.00		210.05	210.05
030706	Containers	02/15/2011	10,238.73	0.00		469.28	469.28
030707	Containers	02/15/2011	5,733.90	0.00		525.61	525.61
030726	Containers	02/15/2011	1,036.79	0.00		47.52	47.52
030728	Containers	02/15/2011	1,124.85	0.00		51.56	51.56
030729	Containers	02/15/2011	1,907.99	0.00		87.45	87.45
030843	Containers	03/15/2011	12,809.81	0.00		533.74	533.74
030844	Containers	03/15/2011	10,777.09	0.00		898.09	898.09
030889	Containers	03/15/2011	11,968.13	0.00		995.11	995.11

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
031060	Containers	04/15/2011	23,104.39	0.00	866.42	866.42
031061	Containers	04/15/2011	903.50	0.00	67.76	67.76
031071	Containers	04/15/2011	8,585.09	0.00	321.94	321.94
031072	Containers	04/15/2011	2,154.46	0.00	161.58	161.58
031232	Containers	05/15/2011	7,383.16	0.00	246.11	246.11
031233	Containers	05/15/2011	2,628.25	0.00	175.22	175.22
031247	Containers	05/15/2011	1,652.52	0.00	55.08	55.08
031427	Containers	06/15/2011	3,512.57	0.00	102.45	102.45
031428	Containers	06/15/2011	8,461.70	0.00	493.60	493.60
031431	Containers	06/15/2011	14,519.88	0.00	423.50	423.50
031432	Containers	06/15/2011	10,590.77	0.00	617.80	617.80
031450	Containers	06/15/2011	9,846.25	0.00	287.18	287.18
031451	Containers	06/15/2011	8,308.07	0.00	484.64	484.64
031602	Containers	07/15/2011	29,263.85	0.00	731.60	731.60
031603	Containers	07/15/2011	7,220.08	0.00	361.00	361.00
031757	Containers	08/15/2011	5,445.33	0.00	113.45	113.45
031758	Containers	08/15/2011	112.39	0.00	4.68	4.68
032140	Containers	09/15/2011	883.79	0.00	14.73	14.73
032141	Containers	09/15/2011	191.36	0.00	6.38	6.38
032176	Containers	09/15/2011	7,103.30	0.00	118.39	118.39
032178	Containers	09/15/2011	12,602.85	0.00	210.05	210.05
032179	Containers	09/15/2011	4,612.74	0.00	153.76	153.76
032630	Containers	11/15/2011	5,532.08	0.00	46.10	46.10
032631	Containers	11/15/2011	3,751.28	0.00	62.52	62.52
032636	Containers	11/15/2011	5,884.08	0.00	49.03	49.03
032637	Containers	11/15/2011	5,253.86	0.00	87.57	87.57
032650	Containers	11/15/2011	662.30	0.00	5.52	5.52
032651	Containers	11/15/2011	2,803.03	0.00	46.72	46.72
032685	Containers	11/15/2011	680.25	0.00	5.67	5.67
032686	Containers	11/15/2011	99.53	0.00	1.66	1.66
032902	Containers	12/15/2011	697.46	0.00	2.91	2.91
032903	Containers	12/15/2011	5,978.24	0.00	49.82	49.82

**G/L Asset Acct No = 107007**

014574	Containers	09/15/2004	\$ 27,361.37	\$ 17,328.89	\$ 2,736.14	\$ 20,065.03
015008	Containers	12/15/2004	30,500.12	18,554.23	3,050.01	21,604.24
015010	Containers	12/15/2004	10,648.69	6,477.96	1,064.87	7,542.83
015038	Containers	12/15/2004	15,508.26	9,434.22	1,550.83	10,985.05

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

Sys No	Description	Acquired	Prior Accumulated		Current YTD	Current Accumulated
		Date	Acquired Value	Depreciation		
015204	Containers	02/15/2005	5,746.29	3,399.89	574.63	3,974.52
015246	Containers	02/15/2005	19,510.56	11,543.77	1,951.06	13,494.83
015260	Containers	02/15/2005	31,861.26	18,851.27	3,186.13	22,037.40
015339	Containers	03/15/2005	11,779.46	6,871.37	1,177.95	8,049.32
015385	Containers	03/15/2005	12,745.33	7,434.76	1,274.53	8,709.29
015388	Containers	03/15/2005	1,579.25	921.25	157.91	1,079.16
015455	Containers	04/15/2005	9,052.14	5,204.96	905.21	6,110.17
015461	Containers	04/15/2005	6,326.66	3,637.85	632.67	4,270.52
015499	Containers	04/15/2005	4,526.89	2,602.97	452.69	3,055.66
015512	Containers	04/15/2005	27,314.41	15,705.78	2,731.44	18,437.22
015612	Containers	04/15/2005	3,591.38	2,065.05	359.14	2,424.19
015912	Containers	08/15/2005	13,211.73	7,156.34	1,321.17	8,477.51
016163	Containers	09/15/2005	22,783.97	12,151.47	2,278.40	14,429.87
016360	Containers	10/15/2005	10,403.60	5,461.89	1,040.36	6,502.25
016440	Containers	11/15/2005	11,280.19	5,828.10	1,128.02	6,956.12
016442	Containers	11/15/2005	7,723.90	3,990.68	772.39	4,763.07
017285	Containers	02/15/2006	11,232.81	5,522.80	1,123.28	6,646.08
017288	Containers	02/15/2006	20,368.30	10,014.42	2,036.83	12,051.25
017316	Containers	02/15/2006	9,626.54	4,733.03	962.65	5,695.68
017749	Containers	04/15/2006	752.11	357.25	75.21	432.46
018606	Containers	07/15/2006	829.78	373.41	82.98	456.39
018666	Containers	08/15/2006	19,588.42	17,303.09	2,285.33	19,588.42
018939	Containers	09/15/2006	15,097.31	13,084.33	2,012.98	15,097.31
019148	Containers	10/15/2006	27,504.99	11,689.63	2,750.50	14,440.13
019162	Containers	10/15/2006	5,380.04	2,286.50	538.00	2,824.50
019478	Containers	11/15/2006	3,433.98	1,430.83	343.40	1,774.23
019481	Containers	11/15/2006	9,318.91	3,882.88	931.89	4,814.77
019511	Containers	11/15/2006	5,448.27	2,270.13	544.83	2,814.96
019531	Containers	11/15/2006	16,563.28	6,901.38	1,656.33	8,557.71
019768	Containers	12/15/2006	753.35	307.64	75.34	382.98
019821	Containers	12/15/2006	1,256.31	512.99	125.63	638.62
020065	Containers	01/15/2007	889.80	355.92	88.98	444.90
020077	Containers	01/15/2007	6,894.58	2,757.84	689.46	3,447.30
020100	Containers	01/15/2007	35,921.19	28,736.96	7,184.23	35,921.19
020265	Containers	02/15/2007	1,116.50	437.29	111.65	548.94
020277	Containers	02/15/2007	15,983.35	6,260.16	1,598.34	7,858.50
020621	Containers	04/15/2007	8,611.67	6,458.74	1,722.33	8,181.07
020723	Containers	05/15/2007	2,750.67	1,008.59	275.07	1,283.66
021185	Containers	07/15/2007	6,087.31	2,130.56	608.73	2,739.29
021271	Containers	07/15/2007	3,011.59	1,054.06	301.16	1,355.22

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
021689	Containers	09/15/2007	7,246.26	2,415.43	724.63	3,140.06
021917	Containers	10/15/2007	22,543.25	7,326.57	2,254.33	9,580.90
021929	Containers	10/15/2007	7,704.88	2,504.09	770.49	3,274.58
022001	Containers	10/15/2007	14,771.99	9,601.80	2,954.40	12,556.20
022092	Containers	11/15/2007	7,603.93	2,407.90	760.39	3,168.29
022106	Containers	11/15/2007	24,632.76	7,800.39	2,463.28	10,263.67
022233	Containers	11/15/2007	56,145.66	17,779.47	5,614.57	23,394.04
022970	Containers	02/15/2008	22,147.76	6,459.77	2,214.78	8,674.55
023018	Containers	02/15/2008	20,221.20	5,897.85	2,022.12	7,919.97
023082	Containers	02/15/2008	19,328.01	11,274.67	3,865.60	15,140.27
023083	Containers	02/15/2008	11,817.55	6,893.57	2,363.51	9,257.08
023292	Containers	04/15/2008	5,876.04	1,615.90	587.60	2,203.50
023295	Containers	04/15/2008	1,923.87	529.07	192.39	721.46
023520	Containers	05/15/2008	2,799.62	746.56	279.96	1,026.52
023638	Containers	05/15/2008	4,630.38	2,469.54	926.08	3,395.62
023639	Containers	05/15/2008	24,314.78	12,967.89	4,862.96	17,830.85
023742	Containers	06/15/2008	2,132.82	550.98	213.27	764.25
023757	Containers	06/15/2008	786.60	203.21	78.66	281.87
023869	Containers	07/15/2008	4,023.99	1,005.99	402.39	1,408.38
023904	Containers	07/15/2008	25,104.14	6,276.03	2,510.41	8,786.44
023936	Containers	07/15/2008	4,092.41	1,023.09	409.23	1,432.32
024225	Containers	08/15/2008	21,556.58	10,419.02	4,311.32	14,730.34
024297	Containers	09/15/2008	18,944.58	4,420.41	1,894.46	6,314.87
024394	Containers	09/15/2008	25,417.66	11,861.57	5,083.53	16,945.10
024595	Containers	10/15/2008	2,746.76	618.03	274.68	892.71
024732	Containers	11/15/2008	15,639.83	3,388.62	1,563.98	4,952.60
024734	Containers	11/15/2008	2,668.17	578.11	266.82	844.93
025019	Containers	12/15/2008	16,427.83	6,844.94	3,285.57	10,130.51
025102	Containers	01/15/2009	1,639.47	327.90	163.95	491.85
025154	Containers	01/15/2009	4,832.71	966.53	483.26	1,449.79
025188	Containers	01/15/2009	3,582.84	716.56	358.28	1,074.84
025200	Containers	01/15/2009	24,756.36	9,902.54	4,951.27	14,853.81
025223	Containers	02/15/2009	1,412.49	270.73	141.25	411.98
025306	Containers	02/15/2009	16,386.22	3,140.68	1,638.61	4,779.29
025307	Containers	02/15/2009	704.30	134.99	70.43	205.42
025308	Containers	02/15/2009	1,412.49	270.73	141.25	411.98
025500	Containers	03/15/2009	1,455.08	266.77	145.51	412.28
025528	Containers	03/15/2009	1,412.49	129.48	70.63	200.11
025556	Containers	03/15/2009	19,768.86	7,248.58	3,953.76	11,202.34
025557	Containers	03/15/2009	4,997.15	1,832.29	999.43	2,831.72

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

Sys No	Description	Acquired	Prior Accumulated		Current YTD	Current Accumulated
		Date	Acquired Value	Depreciation		
025659	Containers	04/15/2009	1,412.49	247.19	141.25	388.44
026229	Containers	07/15/2009	25,035.49	7,510.65	5,007.10	12,517.75
026263	Containers	08/15/2009	4,165.43	590.10	416.54	1,006.64
026348	Containers	08/15/2009	578.90	82.01	57.89	139.90
026624	Containers	09/15/2009	12,951.54	3,453.75	2,590.31	6,044.06
026830	Containers	10/15/2009	52,680.22	6,585.03	5,268.02	11,853.05
027203	Containers	11/15/2009	25,445.98	5,937.40	5,089.20	11,026.60
027230	Containers	11/15/2009	4,175.71	835.14	556.76	1,391.90
027268	Containers	11/15/2009	5,288.55	933.27	622.18	1,555.45
027306	Containers	11/15/2009	4,152.53	655.67	437.11	1,092.78
027554	Containers	01/15/2010	1,165.10	116.51	116.51	233.02
027962	Containers	02/15/2010	3,402.50	311.90	340.25	652.15
028688	Containers	05/15/2010	15,198.75	2,026.50	3,039.75	5,066.25
029210	Containers	08/15/2010	33,751.71	2,812.64	6,750.34	9,562.98
029906	Containers	12/15/2010	2,147.65	17.90	214.77	232.67
029909	Containers	12/15/2010	4,872.71	40.61	487.27	527.88
030103	Containers	01/15/2011	2,329.79	0.00	232.98	232.98
030708	Containers	02/15/2011	7,708.09	0.00	706.58	706.58
030845	Containers	03/15/2011	3,160.54	0.00	263.38	263.38
030890	Containers	03/15/2011	11,342.46	0.00	945.21	945.21
030968	Containers	03/15/2011	54,059.28	0.00	9,009.88	9,009.88
031062	Containers	04/15/2011	10,476.39	0.00	785.73	785.73
031310	Containers	05/15/2011	10,535.80	0.00	1,404.77	1,404.77
031433	Containers	06/15/2011	14,456.21	0.00	843.28	843.28
031452	Containers	06/15/2011	13,265.92	0.00	773.85	773.85
031604	Containers	07/15/2011	19,797.38	0.00	989.87	989.87
031648	Containers	07/15/2011	100,761.02	0.00	10,076.10	10,076.10
031759	Containers	08/15/2011	6,030.18	0.00	251.26	251.26
032177	Containers	09/15/2011	9,148.39	0.00	304.95	304.95
032180	Containers	09/15/2011	12,319.53	0.00	410.65	410.65
032522	Containers	10/15/2011	51,601.88	0.00	2,580.09	2,580.09
032524	Containers	10/15/2011	23,052.82	0.00	1,152.64	1,152.64
032632	Containers	11/15/2011	9,070.54	0.00	151.18	151.18
032638	Containers	11/15/2011	9,174.04	0.00	152.90	152.90

**G/L Asset Acct No = 107015**

015172	Trailers	01/15/2005	\$ 164,606.55	\$ 176,967.55	\$ 0.00	\$ 176,967.55
015585	Trailer	04/15/2005	81,327.00	81,327.00	0.00	81,327.00

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
<b>G/L Asset Acct No = 107035</b>						
000417	Trailers	11/06/1996	\$ 19,500.00	\$ 19,500.00	\$ 0.00	\$ 19,500.00
000419	Trailers	12/02/1996	7,377.00	7,377.00	0.00	7,377.00
000420	Trailers	12/03/1996	25,206.00	25,206.00	0.00	25,206.00
001334	Trailers	01/21/1998	18,250.00	18,250.00	0.00	18,250.00
001335	Trailers	01/21/1998	18,250.00	18,250.00	0.00	18,250.00
001891	Trailers	03/03/1999	4,935.25	4,935.25	0.00	4,935.25
001892	Trailers	03/03/1999	4,935.25	4,935.25	0.00	4,935.25
001894	Trailers	03/17/1999	1,478.05	1,478.05	0.00	1,478.05
007352	Trailers	11/01/1999	780.00	780.00	0.00	780.00
007550	Trailers	11/01/1999	1,800.00	1,800.00	0.00	1,800.00
007769	Trailers	11/01/1999	2,400.00	2,400.00	0.00	2,400.00
033023	2006 Ford Van	12/15/2011	8,000.00	0.00	133.33	133.33

**G/L Asset Acct No = 107045**

002919	Collection Equipment	11/01/1999	20.00	20.00	0.00	20.00
003216	Collection Equipment	11/01/1999	40.00	40.00	0.00	40.00
003318	Collection Equipment	11/01/1999	50.00	50.00	0.00	50.00
003888	Collection Equipment	11/01/1999	130.00	130.00	0.00	130.00
003992	Collection Equipment	11/01/1999	150.00	150.00	0.00	150.00
004476	Collection Equipment	11/01/1999	240.00	240.00	0.00	240.00
005108	Collection Equipment	11/01/1999	550.00	550.00	0.00	550.00
005260	Collection Equipment	11/01/1999	650.00	650.00	0.00	650.00
005787	Collection Equipment	11/01/1999	1,100.00	1,100.00	0.00	1,100.00
006490	Collection Equipment	11/01/1999	4,200.00	4,200.00	0.00	4,200.00
006527	Collection Equipment	11/01/1999	4,600.00	4,600.00	0.00	4,600.00
009391	Collection Equipment	04/15/2000	5,401.13	5,401.13	0.00	5,401.13
011038	Collection Equipment	02/15/2002	7,445.17	6,638.63	744.52	7,383.15
023098	Collection Equipment	02/15/2008	92,419.00	26,955.54	9,241.90	36,197.44
023406	Collection Equipment	04/15/2008	6,905.30	1,931.14	702.23	2,633.37

**G/L Asset Acct No = 107045**

033014	Collection equipment	12/15/2011	9,500.00	0.00	113.10	113.10
033015	Collection equipment	12/15/2011	20,000.00	0.00	238.10	238.10
033016	Collection equipment	12/15/2011	2,500.00	0.00	104.17	104.17
033017	Collection equipment	12/15/2011	5,500.00	0.00	76.39	76.39
033018	Collection equipment	12/15/2011	2,500.00	0.00	104.17	104.17
033019	Collection equipment	12/15/2011	5,000.00	0.00	69.45	69.45

**STERICYCLE OF WASHINGTON, INC. 2011  
DEPRECIATION SCHEDULE**

<b>Sys No</b>	<b>Description</b>	<b>Acquired Date</b>	<b>Acquired Value</b>	<b>Prior Accumulated Depreciation</b>	<b>Current YTD</b>	<b>Current Accumulated</b>
033020	Collection equipment	12/15/2011	2,500.00	0.00	104.17	104.17
033021	Collection equipment	12/15/2011	3,000.00	0.00	100.00	100.00
033022	Collection equipment	12/15/2011	3,500.00	0.00	109.38	109.38
<b>G/L Asset Acct No = 107060</b>						
001063	Office Furniture	06/23/1997	1,020.79	1,020.79	0.00	1,020.79
005506	Office Furniture	11/01/1999	750.00	750.00	0.00	750.00
<b>G/L Asset Acct No = 107065</b>						
017082	Office equipment	12/15/2005	\$ 1,741.36	\$ 1,741.36	\$ 0.00	\$ 1,741.36
019973	Office equipment	12/15/2006	1,177.01	1,177.01	0.00	1,177.01
022375	Office equipment	12/15/2007	22,131.46	22,131.46	0.00	22,131.46
023976	Office equipment	07/15/2008	16,710.75	13,925.63	2,785.12	16,710.75
023992	Office equipment	07/15/2008	19,220.11	16,016.75	3,203.36	19,220.11
033024	Office equipment	12/15/2011	3,000.00	0.00	125.00	125.00
<b>Grand Total</b>			<b>\$ 3,549,806.83</b>	<b>\$ 1,340,157.05</b>	<b>\$ 295,109.40</b>	<b>\$ 1,635,266.45</b>



**Exhibit DR #22**

Date	Type of Regulatory Action	Deficiency/Action Plan/Comments/ Details of all follow up	Roadside Inspection - Action	Truck, Trailer, Dolly No., State	Location Name
1/6/2009	Road Side Inspection	<p>No medical certificate on drivers possession (\$179.00 fine). Driver had MEC, but was unable to locate during time of inspection. Driver compliance with MEC requirements has been verified by Transportation Supervisor and AMESH.</p> <p>Failure to carry the required number of tire chains. (Had 2. 4 Required).</p>	Citation	414416/A29985W	Kent, WA
4/17/2011	Road Side Inspection	RCW 46.37.495 FAILURE TO USE SAFETY CHAINS	Citation	TT INTL 2007 WA 09877RP, ST TRIM 1999 WA 0310TK, ST NATW 1987 WA 7890MG.	Kent, Wa
9/6/2011	Road Side Inspection	392.7 Displaying Expired Tabs	Citation	TR 2007 FRGHTLNR B9U964P WA	Woodinville, Wa
12/7/2011	Road Side Inspection	392.2 Local Laws RCW 46.16A.030.5L Expired Registration	Citation	TR FRHT 2005 WA A29985W	Kent, Wa
3/19/2012	Road Side Inspection	<p>392.2 Local Laws - Expired Registration</p> <p>392.2 Local Laws - No proof of insurance</p>	Citation	TR INTER 2010 WA B42987K	Woodinville, WA



**Stericycle**<sup>®</sup>  
Medical Waste Service

Exhibit DR #23-2

## Regulated Medical Waste Service

*Products and Service to Properly Manage RMW*

WELCOME KIT



*A reference package of our  
integrated service offerings,  
which focus on Protecting People  
and Reducing Risk.*



## TABLE OF CONTENTS

Company Overview . . . . .	2-3
Service Benefits . . . . .	4
Accepted RMW . . . . .	5
Not Accepted RMW . . . . .	6
Support Materials . . . . .	7
On-Line Manifest Archive System . . . . .	8-9
The Bio Track System . . . . .	10-11
Stericycle Capabilities . . . . .	12



# WELCOME

### IMPORTANT INFORMATION AND NUMBERS

#### **Stericycle**

Website	<a href="http://www.stericycle.com">www.stericycle.com</a>
Customer Service	(866) 338-5120
On-line Customer Service	<a href="mailto:customercare@stericycle.com">customercare@stericycle.com</a>
Product Catalog	(866) 338-5120

**On-Line Manifest Archive** [www.sterimanifestarchive.com](http://www.sterimanifestarchive.com)

**State by State Regulations** [www.envcap.org/statetools](http://www.envcap.org/statetools)

**U.S. EPA** [www.epa.gov](http://www.epa.gov)

**Federal DOT** [www.dot.gov](http://www.dot.gov)

**Hazardous Materials Guidelines** [www.hazmat.dot.gov](http://www.hazmat.dot.gov)

**OSHA** [www.osha.gov](http://www.osha.gov)

**Center for Disease Control** [www.cdc.gov](http://www.cdc.gov)

**The Joint Commission** [www.jointcommission.org](http://www.jointcommission.org)



## COMPANY OVERVIEW

---

### **Protecting People. Reducing Risk. That's Stericycle.**

Our mission is to combine integrated solutions with superior customer service to promote safety, compliance and risk management for our customers. We provide a broad portfolio of services to a diverse customer base. Services include medical waste disposal, OSHA compliance training, product recall and return services, sharps disposal management, Rx waste and hazardous waste disposal, Sustainable Solutions™, and telephone answering services. Each service helps to protect people or reduces risk of a negative personal or corporate outcome. We do this primarily in the healthcare field (MDs, clinics, hospitals, DDS, Vets, blood banks, dialysis centers, pharmaceutical and medical device manufacturers) but also for durable and consumer goods manufacturers and retailers.

Since we began in 1989, Stericycle has become a leading provider of regulated medical waste management services in North America, the UK, Brazil, Argentina, Chile, Ireland, Romania, Portugal, Spain and Japan. As medical waste regulations were adopted to protect the public, we saw the opportunity to manage medical waste for a wide variety of healthcare customers far more efficiently than they could on their own – and in compliance with local regulations. Moreover, we developed a patented treatment process that is safe, clean and reduces the volume of medical waste in landfills.

Today, we're an international medical waste management service provider, but medical waste disposal was just the beginning. We're constantly seeking to develop new services and technologies that expand our ability to protect people and reduce risk for our customers. We are also the leading processor of product recalls and retrievals in U.S., the leader in telephone answering services for the healthcare field in the U.S., and a leader in the emerging field of "green" Sustainable Solutions™ for multiple waste streams and unsalable inventory for hospitals, manufacturers and retailers. In total, we serve over 528,000 customers on four continents.



We're constantly seeking to develop new services and technologies that expand our ability to protect people and reduce risk for our customers.



---

**In addition to our diverse customer base and broad range of high-quality services, our advantages in the healthcare industry include:**

### **Industry leadership**

We are the industry's most efficient, fully integrated operator, the leading market innovator, and the industry's environmental and safety leader.

### **An established national network**

Our network of over 60 treatment/collection centers and over 100 transfer and collection sites operate as an integrated network throughout North America. With facilities nationwide, we have the unique capability to respond swiftly to natural and internal disasters that could cripple a customer's operations.

### **Efficient operations**

Our vertically integrated network and broad geographic presence means we are able to increase our route densities, so our drivers make more stops per shift and keep the distance traveled to treatment facilities to a minimum.

### **Regulatory Expertise**

Our regulatory compliance team has unsurpassed knowledge of OSHA, DOT, EPA, FDA and The Joint Commission (TJC) regulations and standards. We help decipher complex federal, state and local regulations to insure our customers are in compliance.

### **Data Management**

Our bar-coding system tracks containers from the point of generation to treatment, assisting healthcare customers with the proper documentation of their medical waste.

### **Global Reach**

We combine our technological expertise with the know-how of local teams to offer total solutions that address local and national requirements. Since 1996, we have operated in the global market.

**Our portfolio of service offerings for medical facilities, hospitals and systems includes:**



**Stericycle Integrated Waste Stream Solutions** manages all hospital waste streams, 80% of which are highly regulated. This integrated service focuses on environmental best practices, training to comply with complex federal and local regulations, as well as Joint Commission Standards. Waste streams are managed by one provider offering you Sustainable Solutions™ for all your healthcare waste.



**Stericycle Sharps Management Service** reduces the risk of needlesticks, controls cost, frees up valuable hospital staff time, and minimizes the impact of disposable containers on the environment. Each reusable container keeps 600 disposables from reaching the landfill minimizing your carbon footprint.



**Stericycle Rx Waste Compliance Service** is a turnkey service that enables you to keep drugs out of the water system. The service provides characterization, on-site training, collection and disposal of Rx waste in compliance with EPA/DOT regulations and Joint Commission Standards.



**Stericycle Specialty Waste**, the leading hazardous waste service to healthcare facilities, provides waste characterization, transportation and compliant disposal. Our expertise enables the safe and secure management of every type of hazardous waste generated in healthcare, such as: Lab Packs, Flammable Liquids, Xylene, Formalin, Aerosols, and Universal Waste.



## SERVICE BENEFITS

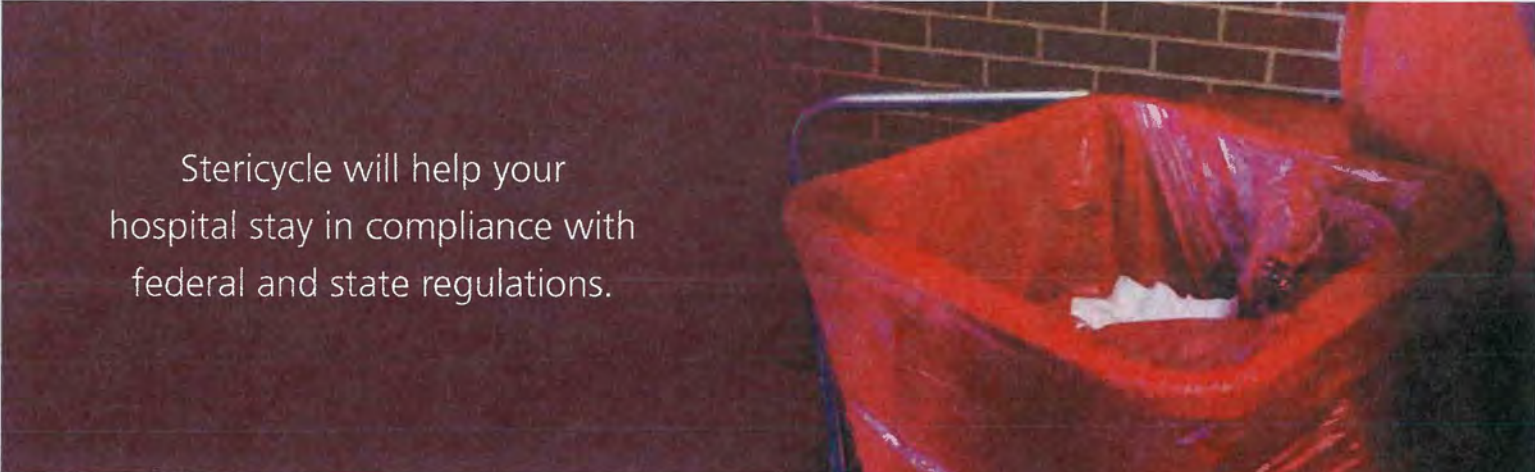
---

Welcome to Stericycle's Regulated Medical Waste Service, a comprehensive offering of services to help you manage the collection, treatment and disposal of Regulated Medical Waste.

As your partner in the management of Regulated Medical Waste, Stericycle is committed to helping you understand the regulations, keeping your institution in compliance and implementing environmentally responsible solutions.

### **Our integrated services include:**

- Regulated Medical Waste collection
- Transportation
- Reusable containers
- Treatment and disposal
- Related safety and health education and training
- Consultative services



Stericycle will help your hospital stay in compliance with federal and state regulations.



# Regulated Medical Waste ACCEPTED By Stericycle

## ACCEPTED REGULATED MEDICAL WASTE



**Sharps** - Means any object contaminated with a pathogen or that may become contaminated with a pathogen through handling or during transportation and also capable of cutting or penetrating skin or a packaging material. Sharps includes needles, syringes, scalpels, broken glass, culture slides, culture dishes, broken capillary tubes, broken rigid plastic, and exposed ends of dental wires.



**Regulated Medical Waste or Clinical Waste or (Bio) Medical Waste** - Means a waste or reusable material derived from the medical treatment of an animal or human, which includes diagnosis and immunization, or from biomedical research, which includes the production and testing of biological products.

## ACCEPTED REGULATED MEDICAL WASTE WHICH MUST BE IDENTIFIED AND SEGREGATED FOR INCINERATION



**Trace Chemotherapy Contaminated Waste** - RCRA Empty drug vials, syringes and needles, spill kits, IV tubing and bags, contaminated gloves and gowns, and related materials as defined in applicable laws, rules, regulations or guidelines.

**Pathological Waste** - Human or animal body parts, organs, tissues and surgical specimen (decanted of formaldehyde, formalin or other preservatives as required per hazardous waste rules).



**Non-RCRA Pharmaceuticals** - Must be characterized and certified as non-RCRA hazardous material by the generator. Excludes all DEA scheduled drugs, including controlled substances.\*

**CALIFORNIA ONLY - Solidified Suction Canisters** - Suction canisters that have been injected with solidifier materials to control liquids or suction canisters made of high heat resistant plastics such as polysulfone.

\* Consult Stericycle Representative for specific requirements

Additional waste acceptance policies may apply based on state or permit specific requirements. Hazardous waste transportation services may be offered in certain geographical locations, under separate contract. Please refer to your local Stericycle Representative for additional information and options for possible hazardous waste handling.

For additional information on container and labeling requirements contact our Stericycle Customer Service Department at (866) 338-5120.





# Regulated Medical Waste NOT ACCEPTED By Stericycle



## Untreated Category A Infectious Substances

RCRA Hazardous Pharmaceutical Waste and all DEA controlled drugs, including controlled substances\*

Chemicals - Formaldehyde, formalin, acids, alcohol, waste oil, solvents, reagents, fixer developer



Hazardous Waste - Drums or other containers with a hazard warning symbol, batteries and other heavy metals

Radioactive Waste - Any container with a radioactivity level that exceeds regulatory or permitted limits; lead-containing materials



Complete Human Remains (including heads, full torsos, and fetuses)

Bulk Chemotherapy Waste

Compressed Gas Cylinders, Canisters, Inhalers and Aerosol Cans



Any Mercury Containing Material or Devices - Any mercury thermometers, Sphygmomanometers, lab or medical devices

Mercury-Containing Dental Waste - Non-contact and contact amalgam and products, chairside traps, amalgam sludge or vacuum pump filters, extracted teeth with mercury fillings and empty amalgam capsules

## \*Consult Stericycle Representative for specific requirements

Additional waste acceptance policies may apply based on state or permit specific requirements. Hazardous waste transportation services may be offered in certain geographical locations, under separate contract. Please refer to your local Stericycle Representative for additional information and options for possible hazardous waste handling.

For additional information on container and labeling requirements contact our Stericycle Customer Service Department at (866) 338-5120.



## SUPPORT MATERIALS

We know that remaining compliant with the regulatory agencies, like the Department of Transportation, is important to you. Therefore, we seek to support your team by providing materials to remind them of these regulatory requirements. In addition, we can provide some of these materials, to better meet your needs, in both English and Spanish.



**Waste Disposal Guidelines**  
(English and Spanish)

This poster indicates what medical waste goes in the red bag and what doesn't go in the red bag.



**Packaging Procedures Poster**  
(English and Spanish)

This poster contains helpful instructions for packaging Regulated Medical Waste safely and correctly for Reusable Containers and Corrugated Boxes.



With more than 23 years of experience, we are prepared to help you navigate the complex world of Regulated Medical Waste.



## ON-LINE MANIFEST

---

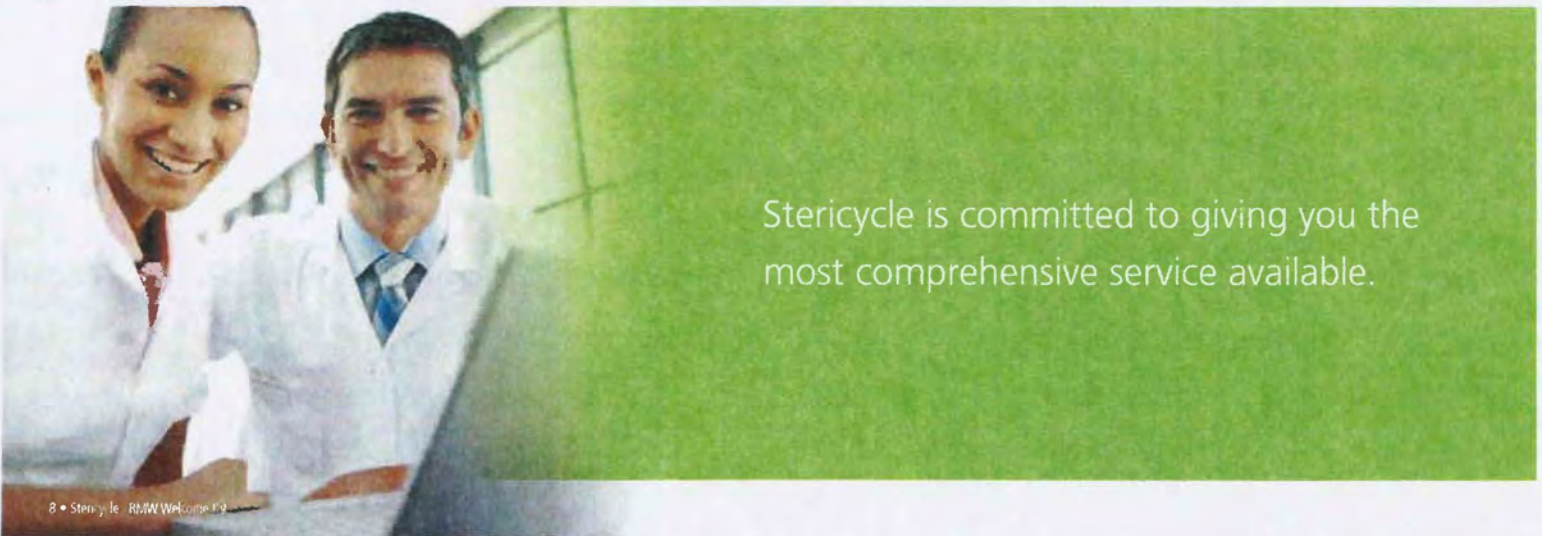
The Stericycle Customer Manifest Archive System, which is available in most markets, saves you time and expense by storing your Regulated Medical Waste Manifests in a convenient on-line database. The Archive System allows you to locate your manifests by date, view, and print your documents on demand.

**This system is available in most states.**



■ Available

■ Unavailable



Stericycle is committed to giving you the most comprehensive service available.

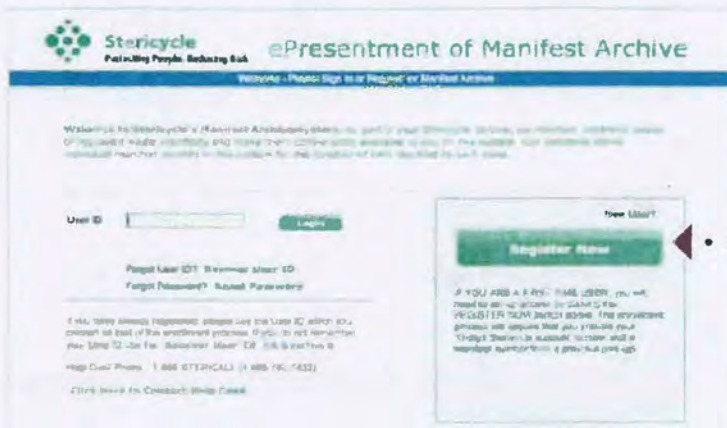
## How to access the On-Line Manifest Archive System

1. Go to [www.stericycle.com](http://www.stericycle.com)
2. Click on **Customer Login** select the **Manifest Archive**



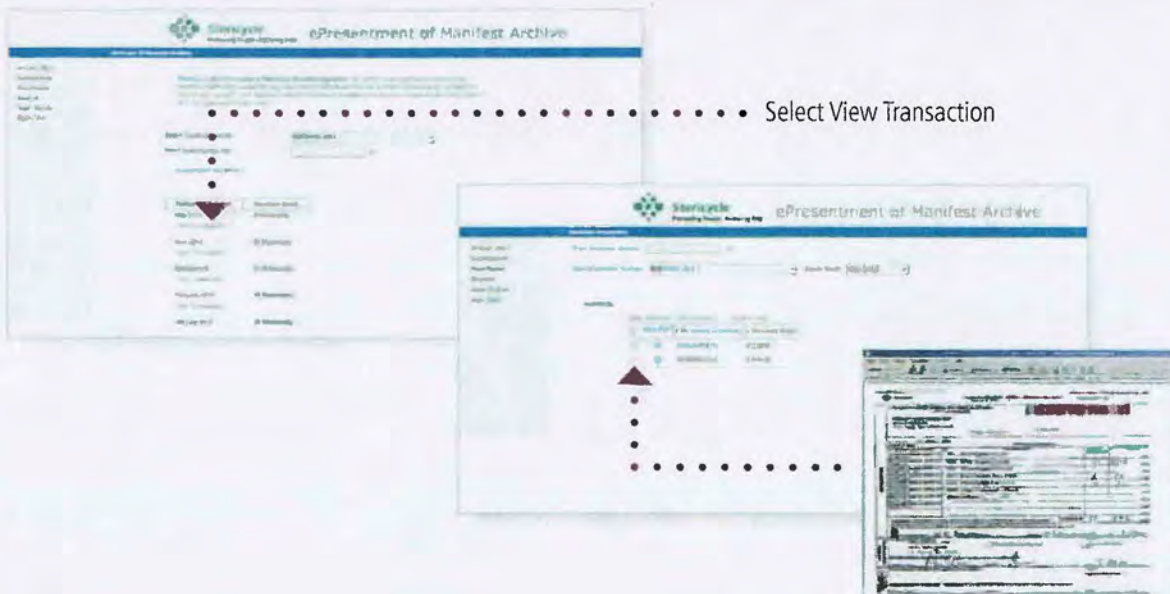
For additional information on this service, please contact your local Stericycle Representative.

### 3. Manifest Archive Login page



First Time Users will be prompted to set up a User Name and Password.

### 4. Manifest Report Page



Sample of manifest



# BIO TRACK

## THE BIO TRACK SYSTEM

Stericycle has a proprietary information management system for tracking that provides detailed documentation of your regulated medical waste. At the time of pick-up, bar codes are placed on each container designated for disposal. Our driver utilizes a hand held computer and scans each container bar code and prints out a record of receipt of all containers that were picked up for disposal.

### Specific benefits include:

- Utilizes bar-codes to track containers from point of collection to treatment;
- Automatically deducts the empty weight of containers, so you pay only for contents; and
- Insures accurate and fast tracking of your regulated medical waste from pick-up to treatment.

**Regulated Medical Waste**



**5148-6015538-001-00A180H**

**Generator**  
Stericycle - San Leandro  
1345 Doolittle Dr Ste C  
San Leandro, CA 94577-2266

**Transporter**  
Stericycle Inc  
1366 Doolittle Drive  
San Leandro, CA 94577  
(510) 562-1781  
Thank You for Choosing Us

**Route Sheet**  
2156 - Test  
Service Date: May 27, 2012  
Truck No: 00011

Route No	Client	Site	Manifest No	Manifest Date	Manifest Time	Manifest Location	Manifest Description	Manifest Weight	Manifest Volume	Manifest Volume Unit	Manifest Volume Unit Description	Manifest Volume Unit Weight	Manifest Volume Unit Volume	Manifest Volume Unit Volume Unit Description	Manifest Volume Unit Weight Unit Description	Manifest Volume Unit Volume Unit Description	Manifest Volume Unit Weight Unit Description	Manifest Volume Unit Volume Unit Description	Manifest Volume Unit Weight Unit Description	Manifest Volume Unit Volume Unit Description	
01	4610745-001																				
<p><b>Manifest # - MDGA08088V</b></p> <p><b>Manifest # - MDGA08088V</b></p>																					
02	0001291-001																				
<p><b>Manifest # - MDGA08088W</b></p> <p><b>Manifest # - MDGA08088W</b></p>																					

Sample of Bio Track Customer Receipt



From pick-up to transport to treatment and disposal. From 'cradle to grave' Stericycle offers assurance and indemnification while your waste is in our control.



# Healthcare Facility Reports

## BIO TRACK HEALTHCARE FACILITY SUMMARY REPORT

Stericycle has the capability to provide you with monthly summary reports, which detail your service utilization for your entire facility.

Summary Report Any Healthcare Facility Customer Number 1009999-001		
Period	Containers	Lbs
December-06	112	11059.4
November-06	156	10872.3
October-06	177	12023.7
September-06	154	10342.9
August-06	161	11967.5
July-06	179	12472.3
June-06	155	10736.6
May-06	162	11668.9
4/30/200306	157	11140.5
March-06	166	12080.3
February-06	148	10512.3
January-07	186	12004
<b>Total</b>	<b>1911</b>	<b>135978.7</b>

An example of the information provided in these reports.

### SPECIFICALLY WE ARE ABLE TO PROVIDE:

- Monthly reports emailed directly to you;
- Monthly Summary Reports utilizing only one label type for the entire health care facility; and
- Data summarized in easy to read spreadsheet format.

## BIO TRACK HEALTHCARE FACILITY DEPARTMENTAL SUMMARY REPORT

Due to the capabilities of our proprietary system, Stericycle has the ability to provide you with monthly detailed departmental summary reports. This report details, by specified department, your service utilization. We are able to provide this type of information only when the specific department is identified by your facility and we have provided separate bar coded labels (in order to track the containers back to your facility and department).

Site ID	Invoice #	Dept ID	Department Name	Total Weight
001	123456789	1371	Pharmacy /IV Rm	11.60
001	123456789	1371	Pharmacy /IV Rm	26.40
001	123456789	1371	Pharmacy /IV Rm	797.96
			<b>Pharmacy /IV Rm Total</b>	<b>825.96</b>
001	123456789	1131	Gen Med / Oncology	184.00
001	123456789	1131	Gen Med / Oncology	12.80
001	123456789	1131	Gen Med / Oncology	35.80
			<b>Gen Med / Oncology Total</b>	<b>232.60</b>
001	123456789	1144	Stcu 1, 2 + 3	364.56
			<b>Stcu 1, 2 + 3 Total</b>	<b>364.56</b>
001	123456789	1145	General Surgery	160.00
			<b>General Surgery Total</b>	<b>160.00</b>
001	123456789	1164	CCU	67.90
001	123456789	1164	CCU	106.90
001	123456789	1164	CCU	0.00
			<b>CCU Total</b>	<b>174.80</b>
001	123456789	1181	OR	104.00
001	123456789	1181	OR	16.80
001	123456789	1181	OR	283.60
			<b>OR Total</b>	<b>404.40</b>
001	123456789	4221	Emergency Room	278.70
001	123456789	4221	Emergency Room	381.00
001	123456789	4221	Emergency Room	52.00
			<b>Emergency Room Total</b>	<b>711.70</b>
001	123456789	4233	Med Cln/Cancer Ctr	229.20
001	123456789	4233	Med Cln/Cancer Ctr	16.40
001	123456789	4233	Med Cln/Cancer Ctr	78.78
001	123456789	4233	Med Cln/Cancer Ctr	10.80
			<b>Med Cln/Cancer Ctr Total</b>	<b>335.18</b>
<b>Grand Total</b>				<b>3,207.46</b>

An example of the information provided in these reports.

### SPECIFICALLY WE ARE ABLE TO PROVIDE:

- Monthly reports emailed directly to you;
- Measurement of regulated medical waste generated by the specifically identified department(s);
- Selection by you of the department(s);
- Unlimited number of department(s) which you can select to track utilization; and
- Data summarized in an easy to read spreadsheet format.



## REGULATED MEDICAL WASTE SERVICE

---

Our offering of services helps you organize and manage a myriad of tasks assigned to environmental services.

### STERICYCLE CAPABILITIES

Regulatory Compliance Expertise

Employee Safety and Health Knowledge

National Network Of Facilities  
and Transportation Resources

Advanced Information Management

Industry Expert

Flexible Solutions

### THE BENEFITS TO YOU AS OUR CUSTOMER

Keep you current with the rules and regulations that are important to TJC and federal, state and local regulatory agencies

Protect your people, a valuable asset

Provide uninterrupted service by responding to disasters through redundancy of assets and location

Reporting capabilities that allow you to track by department

Over 23 years of experience to give you peace of mind

Custom program to manage your needs including sharps and trace chemotherapy



For questions about your  
Regulated Medical Waste Service,  
call us today at **866-338-5120**





PRACTICE  
**Greenhealth**  
MEMBER



**Stericycle®**  
Protecting People. Reducing Risk.™

28161 N. Keith Drive  
Lake Forest, IL 60045  
[www.stericycle.com](http://www.stericycle.com)





**Stericycle**<sup>®</sup>  
Medical Waste Service

## Regulated Medical Waste Service

*Products and Service to Properly Manage RMW*

PROTECTING PEOPLE. REDUCING RISK.™

Waste2Green4Healthcare<sup>SM</sup>



## REGULATED MEDICAL WASTE SERVICE

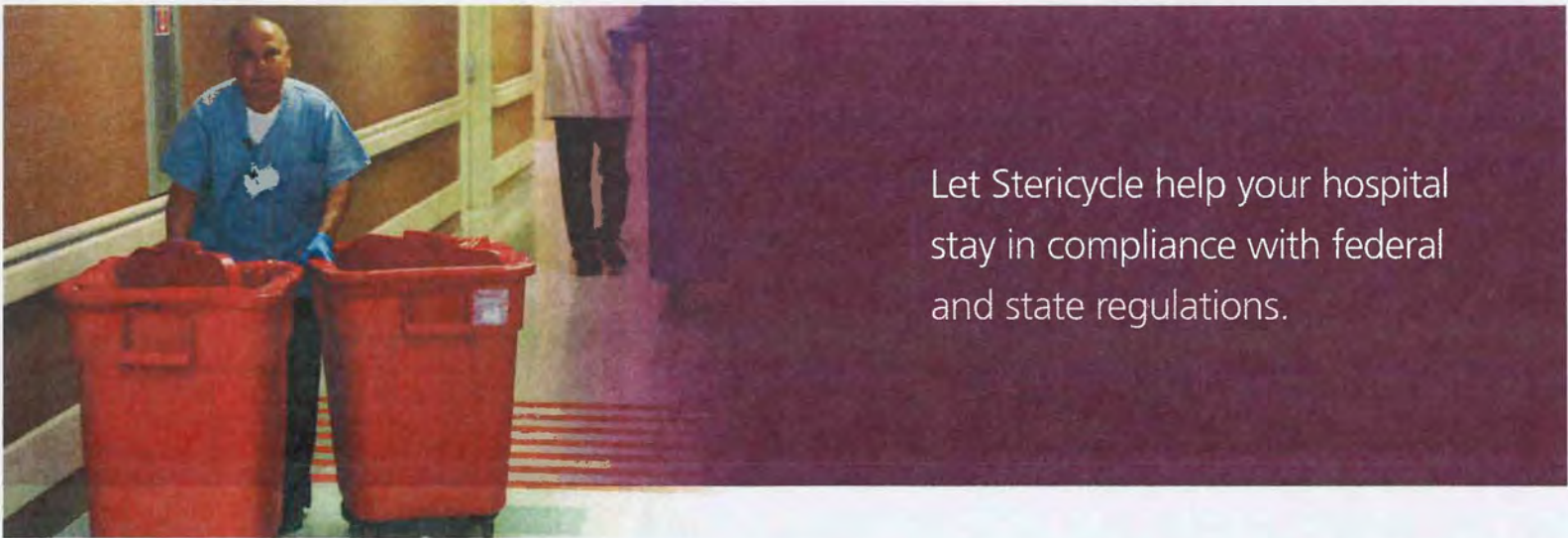
---

Stericycle's comprehensive offering of services help you manage the collection, treatment and disposal of regulated medical waste.

As your partner in the management of Regulated Medical Waste, Stericycle is committed to helping you understand the regulations, keeping your institution in compliance and implementing environmentally responsible solutions.

### **Our integrated services include:**

- Regulated Medical Waste collection
- Transportation
- Reusable Containers
- Treatment and disposal
- Related safety and health education and training
- Consultative services



Let Stericycle help your hospital stay in compliance with federal and state regulations.



You spend a significant amount of time and money on the management of medical waste. The Joint Commission's (TJC) accreditation, environmental and regulatory compliance, the safety and health of your employees and managing the overall cost of medical waste are key priorities. How do you educate your team, and ensure compliance now and into the future?

## Partner with Stericycle...

**Our offering of services helps you organize and manage a myriad of tasks assigned to environmental services.**

### STERICYCLE CAPABILITIES

Regulatory Compliance Expertise

Employee Safety and Health Knowledge

National Network Of Facilities  
and Transportation Resources

Advanced Information Management

Industry Expert

Flexible Solutions

### THE BENEFITS TO OUR CUSTOMER

Keep you current with the rules and regulations that are important to TJC and federal, state and local regulatory agencies

Protect your people, a valuable asset

Provide uninterrupted service by responding to disasters through redundancy of assets and location

Reporting capabilities that allow you to track by department

Over 20 years of experience to give you peace of mind

Custom program to manage your needs including sharps and trace chemotherapy





## REGULATORY COMPLIANCE EXPERTISE

- Joint Commission Environment of Care Standards set requirements for handling regulated medical waste. Stericycle can help you meet the Joint Commission standards.
- AORN states that "blood, bodily fluids, disinfectant solutions and other hazardous materials should be disposed of in accordance with federal, state and local regulatory agency recommendations and with concern for the environment."
- Our Healthcare Compliance Specialists can help you decipher complex information and build a plan to ensure compliance at the federal, state and local levels.
- **Stericycle's commitment to regulatory compliance guarantees you peace of mind when you partner with the industry leader.**



## SAFETY AND HEALTH KNOWLEDGE

- OSHA states that "standard precautions should be observed to prevent contact with blood or other potentially infectious materials...engineering and workplace practice controls should be used to eliminate or minimize employee exposure."
- The Stericycle Environmental Safety and Health team is 35 members strong and well versed in health and safety protocols.
- **Stericycle's expertise in the design and development of work place practices and training programs will help you promote employee safety to protect your valuable and well-trained associates.**



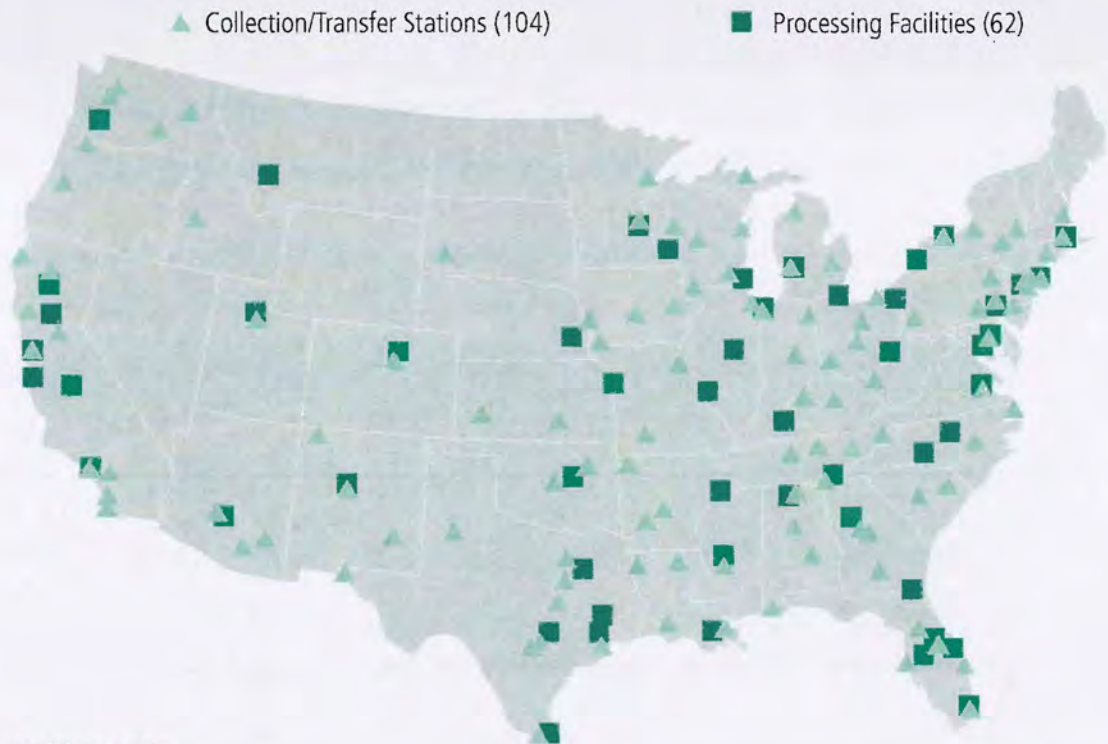
With more than 20 years of experience, we are prepared to help you navigate the complex world of Regulated Medical Waste. A compliance team member is always there to help.



# NETWORK

## A NATIONAL INDUSTRY LEADER. YOUR LOCAL PARTNER.

Stericycle has nationwide treatment facilities and is uniquely positioned to respond promptly to natural and internal disasters that have the potential to cripple your business.



### QUICK FACTS

- Focused on healthcare
- Customers: more than 508,000
- \$1.1 billion – annual revenue
- Expertise in managing highly regulated waste streams for healthcare facilities
- National network of transportation and treatment facilities
- Over 150 collection / processing facilities
- Over 1,400 trucks
- Over 1,000 employees working inside hospitals
- Process over 1 billion lbs. of medical waste per year in the U.S.
- Mission: "Protecting People, Reducing Risk"
- Stericycle has over 1400 route managers who go through rigorous screening and training including criminal background checks, drug testing, DOT hazmat and OSHA bloodborne pathogen training and ongoing medical surveillance.





## ADVANCED INFORMATION MANAGEMENT

- Bio Track is our proprietary information management tool that leverages people, process and technology.
- All containers are scanned, tracked and documented from 'cradle to grave' to fully manage the waste for which hospitals are responsible.
- Bio Track can be used as a measurement tool to track the amount of medical waste generated in a specific department.
- **Identifying the specific department generating the waste and re-directing behavior is the first step in reducing your disposal costs and environmental footprint.**



## TRAINING AND EDUCATION

- We use robust tools to execute a waste audit and implement training programs to deliver a positive and sustainable behavioral change.
- **Stericycle's comprehensive 5-step program guides you through the assessment process where we help you:**
  1. Define the problem and identify a solution
  2. Create a plan for proper waste segregation and identify opportunities in other waste streams such as sharps management, pharma waste, and trace chemo and pathological waste
  3. Execute worker training programs and build plans that are reasonable and actionable
  4. Implement controls to maintain consistency in regulatory policy
  5. Track your progress, report your success and reward your team to maximize your efforts and investment



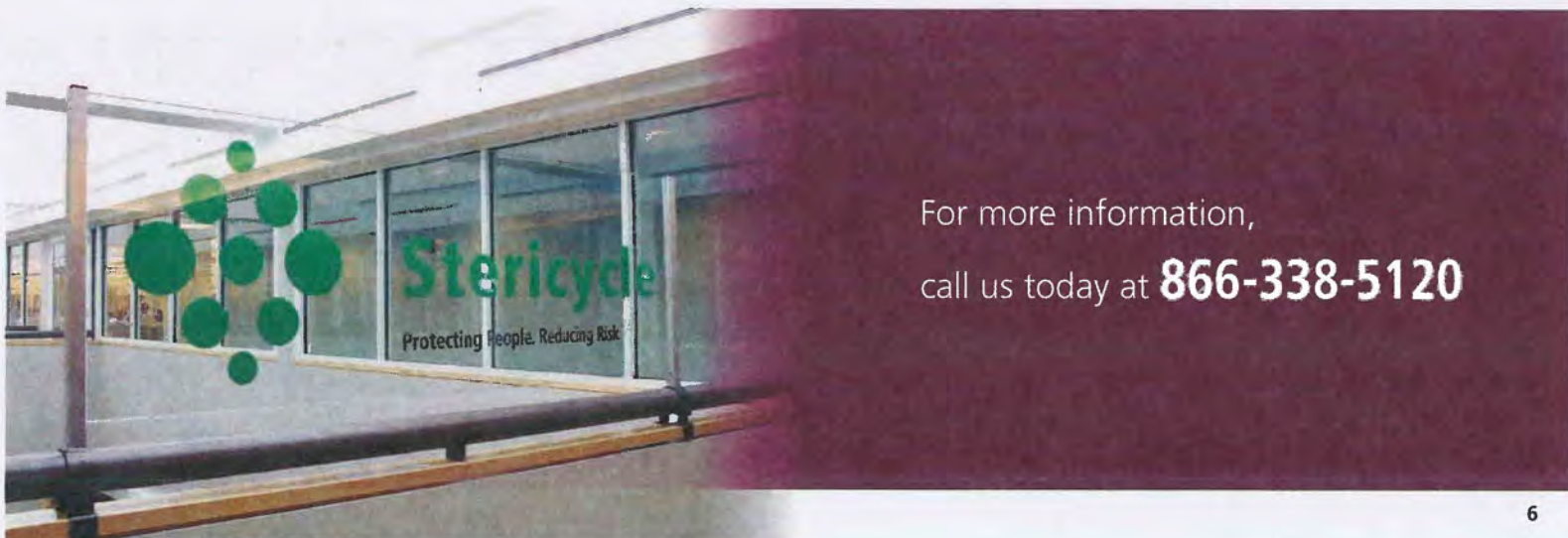
# SOLUTIONS

## FLEXIBLE SOLUTIONS

Our program is tailored to meet your unique needs at the federal, state and local levels.

- Containers are available in a wide variety of sizes
- Ability to manage all of your regulated medical waste
  - Trace chemotherapy and pathological waste
  - Sharps Management Service utilizing Bio Systems Reusable containers
- Environmental education to help your employees understand the value of proper waste segregation to minimize the overall volume of waste
- On-line manifest archive system helps you manage documentation that validates adherence to required tracking procedures – available 24/7

The generator is liable for waste from 'cradle to grave'. We know that your reputation is riding on our trucks. More than 508,000 customers trust Stericycle with this important responsibility. Our experience guarantees you peace of mind when you partner with the industry expert.



For more information,  
call us today at **866-338-5120**





**Stericycle®**  
Protecting People. Reducing Risk.™

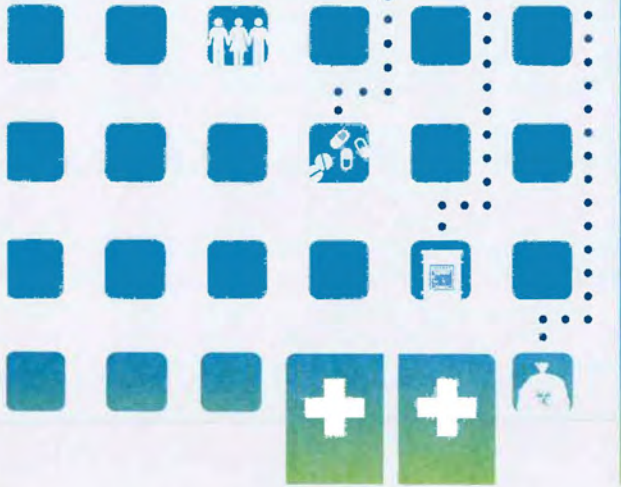
28161 N. Keith Drive  
Lake Forest, IL 60045

[www.stericycle.com](http://www.stericycle.com)





Waste2Green4Healthcare<sup>®</sup>



## *Our Sustainable Solutions<sup>™</sup>*

### **Integrated Waste Stream Solutions**

One Company to Manage All Your Waste Streams

### **Rx Waste Compliance Service**

Keeping Pharmaceuticals Out of the Water

### **Specialty Waste**

Hazardous Waste Service to Help Minimize Your Environmental Impact

### **Regulated Medical Waste**

Products and Service to Properly Manage RMW



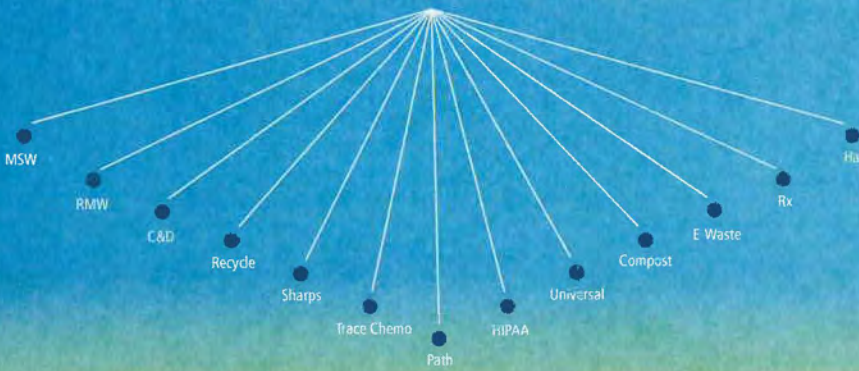
**Stericycle**  
Protecting People. Reducing Risk.™





**Stericycle**  
Integrated Waste Stream Solutions

YOUR SINGLE SOURCE FOR MANAGING ALL WASTE STREAMS



We've Got You Covered



VISIT US AT



**BREAKTHROUGHS**

CONFERENCE 2012 EXHIBITION

**BOOTH #251** June 6-7, 2012

Printed on 60% post-consumer recycled paper



**Stericycle**  
Protecting People. Reducing Risk.™

4010 Commercial Avenue  
Northbrook, IL 60062

<Contact>  
<Title>  
<Company>  
<Address1>  
<Address2>  
<City>, <State> <Zip>





*Concerned about pharmaceuticals in the water?*

*Uncertain as to how to appropriately dispose of pharmaceuticals?*

*Aware of The Joint Commission 2009 Standards?*

*Because you are a valued Stericycle customer you have been selected to...*

Join Us For a  
**Lunch & Learn Experience**

*Our Expert Panel Will Cover the Areas of:*

- ✓ EPA/Regulatory Compliance Issues that Impact the Environment
- ✓ The Joint Commission Standards that Apply to Pharmaceutical Waste
- ✓ How We Can Help You Meet the Needs of the EPA, DOT and The Joint Commission



PROTECTING PEOPLE. REDUCING RISK.™



## Join Us For a Lunch Learn Experience

2333 Waukegan Road • Suite 300  
Bannockburn, IL 60015

### Our Expert Panel:

- **Janet Brown – Director, Sustainable Operations, Practice Greenhealth**  
*Leads environmental improvement activities for members, coordinates monthly Greening Operations webinar, Steering Committee Green Guide for Health Care and Planetree's Design Advisory Council*
- **Michelle Peace – Environmental Engineer, U.S. EPA, Region 6 (Dallas)**  
*Nineteen years with EPA working exclusively in the RCRA Hazardous Waste Program, developing new RCRA regulations, providing regulatory interpretations, BS in Chemical Engineering*
- **Gary J. Robb, RPh - Consultant, Joint Commission Resources, Inc.**  
*Twenty years experience in Pharmacy Applications; CEO of large long term care pharmacy provider; Director of Pharmacy for Acute Care Hospitals; trained as a lean Six Sigma Black Belt; BS in Pharmacy*
- **Dan Fadgen – Rx Waste Compliance Service, Stericycle, Inc.**  
*Thirty years of pharmaceutical industry experience focusing on RCRA issues and solutions for Acute Care Hospitals; BS degree from University of Florida*

Dave Smith  
Director of Pharmacy  
Holyoke Hospital  
575 Beech Street  
Houston, TX 77030

**When: Wednesday, May 27, 2009** **Where: Marriott Houston Medical Center**

**Time: 9:30am - 1:15pm**  
6580 Fannin Street  
Houston, TX 77030

**Cost: FREE!!** **R.S.V.P: May 13, 2009**

*Space is very limited – please use your personalized URL to secure your place at this event.*

**[www.Houston.stericyclesolutions.com](http://www.Houston.stericyclesolutions.com)**

To reserve your place by phone, please call Jackie at (847) 943-6751

PROTECTING PEOPLE. REDUCING RISK.™





**Stericycle®**

**Protecting People. Reducing Risk.™**

**Integrated Waste Stream Solutions**

*One Company to Manage all Your Waste Streams*

**Sharps Management Service**

*Using Bio Systems Reusable Containers*

**Regulated Medical Waste Service**

*Products and Service to Properly Manage RMW*

**Rx Waste Compliance Service**

*Keeping Pharmaceuticals Out of the Water*





**Stericycle**<sup>®</sup>  
Protecting People. Reducing Risk.™



## Waste2Green4Healthcare

### **Integrated Waste Stream Solutions**

One Company to Manage All Your Waste Streams

### **Rx Waste Compliance Service**

Keeping Pharmaceuticals Out of the Water

### **Sharps Management Service**

Using Bio Systems Reusable Containers

### **Regulated Medical Waste**

Products and Service to Properly Manage RMW



This is an eco-friendly exhibit with parts and components that are 100% recyclable.

**SUSTAINABLE SOLUTIONS™**  
**ENVIRONMENTAL BEST PRACTICES**



**PRACTICE**  
**Greenhealth**  
**MEMBER**

# Exhibit 2



SUMMIT LAW GROUP®

*a professional limited liability company*

JESSICA L. GOLDMAN  
DID: (206) 676-7062  
EMAIL: [jessicag@summitlaw.com](mailto:jessicag@summitlaw.com)

July 17, 2012

*Via Email*

Stephen B. Johnson  
Garvey Schubert Barer  
1191 Second Avenue, 18<sup>th</sup> Floor  
Seattle, WA 98101-2939

**Re: Stericycle's Responses to Waste Management's Data Requests**

Dear Steve:

Stericycle's responses to Waste Management's Data Requests are incomplete in various critical ways. We address these deficiencies to you and propose to limit our initial requests in the hope of avoiding further motion practice before the Commission.

The evidence we have received so far suggests that Stericycle of Washington, Inc. ("Stericycle") has been charging higher rates at the expense of the Washington rate payers under tariff rates which are over 20 years old. We believe that Stericycle's financial information will demonstrate that Stericycle is over-earning on its Washington business and/or that the tariff rates are being (and have been) improperly inflated as a result of intra-company charges by its affiliated Morton processing facility. In either case, we believe the Commission would conclude that Stericycle's service is unsatisfactory under RCW 81.77.040. Additionally, we believe that financial information about the collection company will amply demonstrate that Washington rate payers will not be damaged by further competition from Waste Management. Thus, Waste Management is entitled to discover Stericycle's financial information and documents, including costs, revenues and profits, along with financial information regarding Stericycle's affiliated business at the processing facility in Morton and the methodology under which Stericycle is charged for processing at Morton.

Data Request No. 1: Stericycle has objected to producing the requested general ledger for 2011 and has provided instead expense and revenue data. As a compromise, in lieu of the general ledger, we request the more limited balance sheet for Stericycle's Washington operations for calendar year 2011, which would include, without limitation, Stericycle's assets (including fixed assets), liabilities and equity. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Data Request No. 2: To the degree there was any confusion about the term "revenue price-out," please see WAC 480-07-520(4)(f) which defines the term to mean a customer count for each tariff item and rate. Based on your objection, we will agree to limit this request to 2011 and 2012. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Data Request No. 3: Thank you for the information provided, but it is insufficient for us to determine whether Exhibit DR#3 is complete without a further response to Data Request No. 1. Production of the 2011 balance sheet referenced above in Data Request No. 1 will provide us the necessary information. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Data Request No. 7: Stericycle did not object to this data request. We requested the production of documents. Please confirm that Stericycle has no responsive documents. Moreover, the narrative answer Stericycle provided did not meaningfully answer the question posed. Without knowing the total costs of operating the Morton facility, and without knowing the volume from Washington generators, your response is meaningless. As an alternative, to understand the prices or values paid by Stericycle for processing Washington biomedical waste at the Morton facility, we require the price per ton charged to Stericycle for such processing, the number of tons charged to Stericycle for such processing, what percentage of the Morton facility's processing is of Washington biomedical waste, whether the Morton facility charges the same rates to process biomedical waste from outside Washington, and how much it costs to operate the Morton facility. Information for 2011 will suffice.

Data Request No. 8: Stericycle did not object to this data request. However, Stericycle did not provide a complete response. The annual reports Stericycle produced excluded the Regulatory Fee Calculation Schedules on which Stericycle reported its total revenues, including its non fee-paying revenues. Moreover, the

annual reports Stericycle filed failed, as required, to report "total company income" in the Income Statement. While it is evident Stericycle failed to report its non fee-paying revenues, we are unable to determine whether Stericycle also excluded from Schedule 2 its annual reports expenses associated with non fee-paying revenues. In order to have a complete income statement, we request that you either: (1) confirm that expenses associated with non fee-paying revenue were included in the amounts reported, and why; or (2) provide us with expenses associated with non fee-paying revenue if they are not included. We also request the amount of Stericycle's non fee-paying revenue for 2011 and the information described above regarding expenses associated with that revenue.

Data Request No. 10: Stericycle has objected to producing the requested income statements. We cannot evaluate the costs being charged to Stericycle for processing at the Morton facility, and which costs are passed on to Washington ratepayers, without basic financial information about the Morton facility. Stericycle, Inc. is the sole owner of Stericycle of Washington, Inc. and there can be no meaningful claim that Stericycle of Washington, Inc. does not have access to the requested income statements. Your response to Data Request No. 7 suggests that you have access to the total revenues and the total costs of operating the Morton facility and Waste Management must have that information. Further, in place of the requested income statements, Waste Management will accept answers to the following questions for 2009-2012:

- (a) What was Stericycle's landfill disposal cost per ton for each respective year?
- (b) How many pounds per year of Washington biomedical waste was processed at the Morton facility each respective year?
- (c) How many pounds per year of all biomedical waste were processed at the Morton facility each respective year?
- (d) How many pounds per year of Washington biomedical waste collected by Stericycle were land-filled each respective year?
- (e) How many pounds per year of Washington biomedical waste collected by Stericycle were incinerated each respective year?
- (f) Where, and to which entity, was the 2011 \$5,628,493 disposal and processing income recorded?
- (g) Produce all documents describing where, and to which entity, the 2011 \$5,628,493 disposal and processing income was recorded.



To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested documents.

Data Request No. 12: Stericycle did not object to this data request. Please provide a substantive explanation of what is meant by “business considerations,” which otherwise provides no meaningful answer to the request posed.

Data Request No. 14: Stericycle objected to producing the requested information for 1995, 2001, 2009 and 2010. This information is necessary to evaluate the cost per pound for processing the biomedical waste and whether those costs have yielded proper returns to Stericycle under tariff rates which have never been changed, and this information is not reflected on the annual reports for Class C solid waste companies filed by Stericycle, as it is in the annual reports required of Class A companies like Waste Management. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Data Request No. 15: Stericycle objected to producing the requested information which goes directly to the Commission’s stated preference for competition with biomedical waste services. To assist Stericycle in determining the territory in which it is the only service provider, we will limit this request to the locations and generators identified in footnotes 13 and 15 of Waste Management’s Opening Brief on Preliminary Legal Issue (filed June 14, 2012), plus the cities of Bellingham and Moses Lake. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested documents.

Data Request No. 16: Stericycle has objected to producing the requested information. Based on your objection, Waste Management will agree to accept the requested information by zip code instead of by county. This information should be readily available on Stericycle’s billing system. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Data Request No. 17: Based on Stericycle’s objections, Waste Management will forego the information requested for 2009 and 2010. We wish to clarify whether Stericycle transported or arranged to have transported biomedical waste generated in Washington in 2010 and 2011 to Covanta in Brooks, Oregon. Please advise. If the answer is in the affirmative, please provide the requested information as to Covanta.



Data Request No. 19: Stericycle has objected to producing the requested information regarding services to customers with multiple locations in 2009 and 2010. We believe this information will show the industry's move toward consolidation and the effect that consolidation has on the market for biomedical waste services. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Data Request No. 20: Stericycle did not object to this data request. We take your answer to mean that no customer complaint has been made to Stericycle since January 1, 2009. If we are mistaken, please advise.

Data Request No. 21: Stericycle did not object to this data request. We take your answer to mean that no customer complaint has been made about the facility in Morton since January 1, 2009. If we are mistaken, please advise.

Data Request No. 22: Stericycle has objected to producing the requested documents and has, instead, provided some information regarding self-selected "minor citations." Stericycle obviously relied on documents to provide the limited information offered and it does not explain why Waste Management is not entitled to documents regarding other violations which are not reflected in Exhibit DR#22. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested documents.

Data Request No. 24: Stericycle has objected to producing the requested information by referencing Tariff No. 1. However, Tariff No. 1, in its current form and in previous forms, does not state (a) the manufacturer of each type of container, (b) how long Stericycle has been using each type of container, and (c) where in Washington Stericycle provides each such container to customers. You have provided a list of manufacturers which are "include[d]" in the list of manufacturers used by Stericycle without reference to the size of container. That information is not complete and does not respond fully to the Data Request. We believe this information will demonstrate changes made by Stericycle in response to direct competition from Waste Management. To the degree Stericycle still contends this request is unreasonably burdensome, please explain the steps Stericycle would have to take and the expenses Stericycle would have to incur to provide the requested information.

Stephen B. Johnson  
July 17, 2012  
Page 6

I look forward to speaking with you tomorrow to resolve these issues.

Sincerely,

SUMMIT LAW GROUP PLLC

A handwritten signature in black ink, appearing to read "Jessica L. Goldman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jessica L. Goldman

cc: Fronda Woods  
James K. Sells  
Polly L McNeill

# Exhibit 3



G A R V E Y S C H U B E R T B A R E R  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

SEATTLE OFFICE  
*eighteenth floor*  
*second & seneca building*  
*1191 second avenue*  
*seattle, washington 98101-2939*  
TEL 206 464 3939 FAX 206 464 0125

OTHER OFFICES  
*beijing, china*  
*new york, new york*  
*portland, oregon*  
*washington, d.c.*  
GSBLAW.COM

*Please reply to* STEPHEN B. JOHNSON  
*sjohnson@gsblaw.com*  
DIRECT 206-816-1309

July 19, 2012

**VIA EMAIL**

Jessica Goldman, Esq.  
Summit Law Group  
315 5th Ave. S., Suite 1000  
Seattle, WA 98104

**Re: Stericycle's Responses to Waste Management's Data Requests**

Dear Jessica:

Per our telephone conference of July 18, 2012, we provide this interim response for Stericycle of Washington, Inc. ("Stericycle") to your letter of July 17, 2012, in which you raised certain questions about Stericycle's responses to Waste Management's data requests. This response is "interim" because we have yet to connect with all members of the Stericycle team with whom we need to confer before responding definitively on certain points. One key person has been on vacation this week but will return Monday. We will be happy to discuss these responses further in our telephone conference scheduled for July 23 at 3:00 pm.

In general, Stericycle does not agree that your hypothetical claim that Stericycle is "over earning" on its tariff rates is relevant to this application proceeding. The fact is that Stericycle rates and charges are specified in a tariff approved by the Commission. We do not believe that charging Commission-approved tariff rates is or could be evidence that Stericycle will not provide service to the satisfaction of the Commission or that granting overlapping authority to Waste Management is in the public interest. To paraphrase Judge Kopta in another context, Waste Management does not have a legitimate interest in Stericycle's rates.

Moreover, the Commission's case law indicates that the facts relevant to the "satisfactory service" determination are the nature of the applicant's and existing carriers' services. The remedy for unreasonable rates is a rate case. This is not a rate case and we doubt that Judge Kopta will allow you to turn it into one.

**Requests #1 and #3.** Your letter does not state the relevance of the additional information that could be obtained from a 2011 balance sheet. Stericycle's 2011 income and expense at a reasonable level of detail were disclosed to Waste Management with Stericycle's prior responses. The detailed depreciation schedule already provided includes both the acquired value and accumulated depreciation of Stericycle's





assets. At this point, Stericycle does not believe Waste Management's request for a balance sheet is justified without a clear explanation of the relevance of the additional information sought.

Request #2. As discussed above, Judge Kopta made clear that this is not a rate case and that he will not allow it to be turned into a rate case. Stericycle's Commission-approved tariff rates are not at issue in this proceeding. The WAC provision you cite to define the scope of the analysis you are seeking specifically addresses a requirement applicable to rate proceedings. Preparing the information requested would be a very significant burden in terms of time and expense that is not justified by any claim of relevance. Under the rate rules, this burden is imposed on carriers only when they seek a general rate increase, which Stericycle is not attempting to do. We are conferring with our client and will provide additional information on the time and cost that would be entailed to produce the information sought in an update next week.

Request #7. We intend to supplement Stericycle's response to this request with respect to the total costs of operating the Morton facility in 2011 after conferring further with Stericycle next week. Stericycle's prior responses already include the volume of waste processed in 2011. We confirm that we do not have documents responsive to this request. We will provide the requested summary of the arrangements between Stericycle and Stericycle, Inc. next week.

Request #8. Stericycle will supplement its response to this request to produce all Regulatory Fee Calculation Schedules in its possession or control for the years requested. Your additional numbered questions appear to be new requests beyond the scope of Request #8. If any additional questions remain after the supplemental production, Stericycle will, of course, respond to additional data requests per the Commission's rules.

Request #10. Stericycle has fully responded to this request by indicating that the income statements described do not exist. As stated in the response, income statements are not separately prepared for the Morton plant. The Morton plant is a Stericycle, Inc. cost center and no income is allocated to the plant as such. All income from Morton processing operations is reported by Stericycle, Inc. Stericycle has elsewhere in its responses stated the costs of treatment and disposal that are charged to Stericycle based on the number of containers from Washington generators compared to the total number of containers processed at the Morton facility.

Request #12. Stericycle will supplement its response to this data request with a further explanation of the referenced business considerations next week.

Request #14. Your letter indicates that the information requested is relevant to the claim that Stericycle "over earns" on its tariff rates. As stated above, Stericycle's Commission-approved tariff rates are not an issue in this proceeding and we do not believe Waste Management is entitled to audit those rates, particularly since the only basis for the claim seems to be hopeful speculation on the part of Waste Management. But even assuming this line of inquiry is appropriate, Judge Kopta has indicated that Waste Management's inquiries to Protestants are properly confined to the years 2011 and 2012. The relevant time period for evaluating Stericycle's services, or the impact of an additional carrier on those



services, is the date of Waste Management's application and a reasonable window before the filing of that application. Stericycle believes that no additional response for years prior to 2011 is relevant.

Request #15. In response to Waste Management's proposal to alter the scope of this request, Stericycle will supplement its response to state the total weight of biomedical waste that it has collected in 2011 and 2012 (to date) from the counties indicated in footnote 13 of Waste Management's Opening Brief on Preliminary Legal Issue and from Bellingham and Moses Lake if the sub-totals for these cities can be determined with reasonable effort.

Request #16. Your letter does not explain how allocating the weight of biomedical waste collected by Stericycle to individual zip codes is relevant to this proceeding, or even to the incorrect contention that a preference for competition is a basis for finding existing service unsatisfactory. Under Waste Management's theory, if Stericycle is the only provider in some territory then the service is necessarily unsatisfactory. This contention, however, does not turn in any way on the weight of biomedical waste that is collected in any given zip code. Further, the detail sought would give Waste Management access to confidential and proprietary information that would improperly permit Waste Management to focus its sales efforts on Stericycle's most valuable customers.

Request #17. Stericycle confirms that it has not transported or arranged to have transported biomedical waste generated in Washington to the Covanta facility in 2011. Your letter is not clear as to whether you are still seeking a similar confirmation for 2010 (because it states that Waste Management will forgo the information requested for 2009 or 2010). However, we believe the same to be true in 2010 and will confirm.

Request #19. Judge Kopta has indicated that Waste Management's inquiries to Protestants are properly confined to the years 2011 and 2012. Stericycle agrees for reasons previously stated and declines to further supplement its response to this data request.

Request #20. Stericycle now believes there may be confusion as to the scope of the term "customer complaints" as used by Waste Management and requests clarification. Subject to this clarification, Stericycle's answer to this request means what it says, that Stericycle does not have documents in its possession or control that discuss, refer to, or reflect "customer complaints" since January 1, 2009. This is a complete answer to the request for production of documents.

Request #21. Stericycle now believes there may be confusion as to the scope of the term "customer complaints" as used by Waste Management and requests clarification. Subject to this clarification, Stericycle's answer to this request means only what it says, that Stericycle does not have any documents that discuss, refer to, or reflect a "customer complaint" about service at the Morton processing facility. This is a complete answer to the request for production of documents.

Request #22. Stericycle renews its objection to producing documents concerning vehicle inspections that did not result in a citation and concerning any alleged violations by the Morton processing plant as lacking relevance to this proceeding and as unduly burdensome in light of any relevance to this





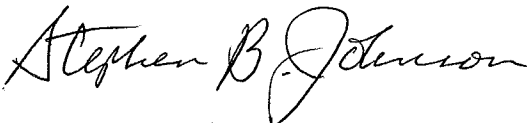
proceeding. The citations identified in Exhibit DR #22 are a complete record of violations/citations in the relevant time period, not a selection. Such violations/citations are logged by Stericycle, but Stericycle does not have primary documents concerning these citations. Stericycle will supplement its response to reflect the clarification contained in this letter, if requested.

Request #24. Stericycle will supplement its response to this request to state the containers (including sizes) currently in use, the manufacturers of those containers, and additional information about when Stericycle started using each of those containers. Each container is used throughout the State of Washington, when and as requested by customers.

In the event that we agree on Monday that there remain discovery disputes between the parties with respect to either Waste Management's or Stericycle's discovery requests that will need to be resolved by Judge Kopta, we would again suggest a brief extension of the deadlines for filing prefiled testimony in order to accommodate the time it will necessarily take to have motions resolved and any further responses ordered by Judge Kopta completed. At this time we suggest approximately two weeks extension, the exact dates we can work out in our Monday conference.

Very truly yours,

GARVEY SCHUBERT BARER

By   
Stephen B. Johnson

cc: Fronda Woods  
James Sells  
Polly McNeill  
Jared Van Kirk  
Stericycle

# Exhibit 4



# SUMMIT LAW GROUP<sup>®</sup>

*a professional limited liability company*

JESSICA L. GOLDMAN  
DID: (206) 676-7062  
EMAIL: [jessicag@summitlaw.com](mailto:jessicag@summitlaw.com)

July 24, 2012

## ***Via Email***

Stephen B. Johnson  
Jared Van Kirk  
Garvey Schubert Barer  
1191 Second Avenue, 18<sup>th</sup> Floor  
Seattle, WA 98101-2939

## **Re: Stericycle's Responses to Waste Management's Data Requests**

Dear Steve and Jared:

Thank you for taking the time yesterday to discuss Waste Management's request that Stericycle of Washington, Inc. ("Stericycle") supplement its data requests. We discussed my letter of July 17 and your response of July 19 and we were able to reach agreement on various issues. I write to confirm my understanding of where we agree and where we do not.

### **Waste Management's Need for the Requested Financial Information**

To start, we discussed Stericycle's contention that Waste Management is not entitled to discover much of the financial information Waste Management requested. I explained that Waste Management seeks the information for two reasons: (1) to rebut Stericycle's claim that it will suffer material financial harm if Waste Management is permitted to compete for business statewide and (2) to demonstrate that Stericycle's more-than-twenty-year-old tariff rates have yielded undue profits to Stericycle at the expense of Washington's rate payers and, hence, that Stericycle cannot provide service to the satisfaction of the Commission under RCW 81.77.040.

You advised that the first argument was a "better" one and that Stericycle did plan on arguing that Stericycle would suffer material financial harm if faced with competition from Waste Management statewide. Nonetheless, Stericycle will not provide all of the financial information requested and which is necessary to rebut Stericycle's claim.

As to the second argument, you advised of Stericycle's belief that such information is only relevant in a rate proceeding initiated by the Commission. You advised that the Commission is responsible for the tariff rates Stericycle charges, that Stericycle has no obligation to change those rates, and that Waste Management may not seek to demonstrate the Commission's lack of satisfaction with Stericycle's service through an analysis of the profits Stericycle has earned as the sole statewide provider of biomedical waste services. You advised that you were not aware of any authority limiting examination of Stericycle's rates to a rate proceeding nor were you aware of any authority which prohibited Waste Management from arguing to the Commission that Stericycle's service was unsatisfactory because of improper profits being made at the expense of Washington rate payers.

**DR Nos. 1 and 3**

Stericycle initially objected to producing the requested general ledger for 2011. As a compromise, in lieu of the general ledger, we offered to accept the more limited balance sheet for Stericycle's Washington operations for calendar year 2011, which would include, without limitation, Stericycle's assets (including fixed assets), liabilities and equity. You asked for an explanation as to the relevance of the balance sheet. I advised that Stericycle has provided a list of depreciated assets and that Waste Management wishes to confirm that the list is complete by cross-referencing the total asset value represented in Stericycle's balance sheet. This information is necessary for both of the reasons set forth above, most particularly to fully evaluate, and rebut, Stericycle's claim that statewide competition from Waste Management will cause material financial harm to Stericycle (and, hence, to rate payers). You advised that the balance sheet was irrelevant and that Stericycle would not produce it. When I asked you what level of burden would be involved in providing the balance sheet, you advised that you did not know.

**DR No. 2**

Stericycle refuses to produce the revenue price-out information for 2011 and 2012 as defined in WAC 480-07-520(4)(f) because you contend such information can only be relevant in a rate case initiated by the Commission. You further advised that preparing the requested information "would be a very significant burden in terms of time and expense." You agreed to provide to me by July 27 specific information as to the time and cost which would be necessary to produce the requested information.

**DR Nos. 14 and 19**

Stericycle refuses to produce the requested information for the years prior to 2011. It is your belief that at the prior telephonic discovery conference with Judge Kopta, he indicated that Waste Management was not entitled to obtain any information from the protestants from prior to 2011. Polly's notes of that call reflect that Judge

Kopta was inclined to limit discovery to 2011 and 2012 where the information was available in the protestants' annual reports.<sup>1</sup> Your client, alone among the parties to this proceeding, files the more limited annual report required of Class C solid waste companies. The information requested in these Data Requests is not reported in Stericycle's annual reports.

**DR No. 15**

In its initial responses, Stericycle professed to lack knowledge as to the precise territory in which it is the only biomedical waste service provider. To assist Stericycle in defining that territory, we offered to limit this request to the locations and generators identified in footnotes 13 and 15 of Waste Management's Opening Brief on Preliminary Legal Issue (filed June 14, 2012), plus the cities of Bellingham and Moses Lake. In your letter of July 19, you agreed to this proposal, excepting footnote 15. Footnote 15 provides a list of the hospitals located in territory served only by Stericycle, where as footnote 13 lists entire counties where Stericycle is the sole service provider. You advised on our call yesterday that you had not spoken about footnote 15 with Stericycle and that you were inclined not to agree to provide information as to those hospitals. However, you agreed to consult with Stericycle and advise me by July 27 as to whether Stericycle will provide the information about the footnote 15 hospitals. In addition, you agreed to provide the information about the territory identified in footnote 13 and the cities of Bellingham and Moses Lake by July 27.

**DR No. 16**

Stericycle professes an inability to provide an answer to DR No. 16's request for volume by county. We proposed, instead, that Stericycle provide the information by zip code. This information is relevant to get a complete picture of where and in what quantities Washington's biomedical waste is generated. This information is relevant to test Stericycle's contention that its economies of scale will be materially harmed and, particularly, that its service to rural areas will suffer material financial harm if Waste Management is permitted to compete statewide. You advised that Stericycle will not provide the information by zip codes because that will permit Waste Management to pinpoint the amount of waste generated by specific generators in zip codes where there is only one generator. You contend this is confidential business information.

---

<sup>1</sup> The referenced comments by Judge Kopta were apparently made off the record and are not contained in the transcript of that call.



**DR Nos. 20-21**

Stericycle professed confusion as to what we meant by "customer complaint." You explained that Stericycle does not document anything to which Stericycle refers to as a "customer complaint." I defined "customer complaint" to mean a communication from a customer reflecting dissatisfaction with service provided or not provided by Stericycle. You explained that requests from customers (which you agreed could include customer complaints as I defined the term) are recorded by Stericycle as "service requests." Although Stericycle did not timely object to these Data Requests, you advised that Stericycle would not provide us with customer complaints found among the service requests. We are entitled to this information to demonstrate that Stericycle cannot serve to the satisfaction of the Commission.

**Information Stericycle Has Agreed to Produce**

DR No. 7: We requested the following 2011 information which you agreed Stericycle would produce by July 27: (1) the price per ton charged to Stericycle for processing at Morton; (2) the number of tons charged to Stericycle for processing at Morton; (3) what percentage of the Morton facility's processing is of Washington biomedical waste; (4) whether the Morton facility charges the same rates to process biomedical waste from outside Washington; and (5) and how much it costs to operate the Morton facility. Information for 2011 will suffice.

DR No. 8: Stericycle will produce the regulatory fee calculation schedules by July 27.

DR No. 12: Stericycle will provide the requested explanation by July 27.

DR No. 17: Stericycle will provide the requested information for 2012 by July 27.

DR No. 24: Stericycle will provide the requested information by July 27.

Sincerely,

SUMMIT LAW GROUP PLLC



Jessica L. Goldman

cc: Fronda Woods  
James K. Sells  
Polly L McNeill

# Exhibit 5

1  
2  
3  
4  
5  
6  
7  
8 BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
9

10 In the Matter of the Application of:

Docket No. TG-120033

11 WASTE MANAGEMENT OF WASHINGTON,  
12 INC. D/B/A WM HEALTHCARE SOLUTIONS  
13 OF WASHINGTON

**STERICYCLE'S SUPPLEMENTAL  
RESPONSES TO WASTE  
MANAGEMENT'S DATA  
REQUESTS**

14 For an Extension of Certificate G-237 for a  
15 Certificate of Public Convenience and Necessity  
to Operate Motor Vehicles in Furnishing Solid  
Waste Collection Service

16 Stericycle of Washington, Inc. supplements its prior responses to Waste Management's  
17 data requests as follows:

18 **DATA REQUEST NO. 1:** Produce a detailed general ledger for your Washington  
19 operations for calendar year 2011.

20 **SUPPLEMENTAL RESPONSE:** Waste Management has revised this data request,  
21 per Jessica Goldman's letter of July 17, 2012. Instead of a general ledger, Waste Management  
22 now seeks a "balance sheet for Stericycle's Washington operations for calendar year 2011."  
23 However, Waste Management has failed to articulate any relevance that Stericycle's balance  
24 sheet might have to any matter at issue in this application proceeding or to the discovery of  
25 relevant evidence. Stericycle objects to this new request on the grounds that it is unreasonably  
26



1 burdensome and seeks information that is neither relevant to this proceeding nor reasonably  
2 calculated to lead to the discovery of relevant, admissible evidence. Stericycle has already  
3 provided an income statement with a reasonable level of detail for its 2011 operations, as well  
4 as complete detail of its depreciable capital assets. This is sufficient for any legitimate purpose  
5 relevant to this proceeding.

6 Stericycle does not prepare a balance sheet for its Washington regulated operations in  
7 the ordinary course of its business and would have to generate one to respond to Waste  
8 Management's request. In substance, this would require reconstruction of Stericycle's book  
9 revenue and expense from its inception. This would require an inordinate commitment of  
10 accounting effort. The burden and expense of creating such a balance sheet is not warranted by  
11 any relevance to this proceeding.

12 Persons with knowledge: Nanette Walker, John Suchla, Mike Philpott.

13 **DATA REQUEST NO. 2:** Provide a detailed revenue price-out (explaining the basis  
14 for your WUTC revenues) for calendar years 2009, 2010, 2011, and 2012 (to date) respectively,  
15 including the volume of each size container you collected in each year, the number of  
16 customers for each size container in each year, and the rate you charged for each such  
17 collection in each year.

18 **SUPPLEMENTAL RESPONSE:** Stericycle reiterates its prior objections to this  
19 request on the grounds that it is unreasonably burdensome and seeks information that is neither  
20 relevant to this proceeding nor reasonably calculated to lead to the discovery of relevant,  
21 admissible evidence. This data request is unduly burdensome in that the requested "revenue  
22 price-out" does not exist and would require a costly and time-intensive analysis of Stericycle  
23 billing data that is not warranted by any reasonable need by Waste Management for the  
24 information requested. Stericycle estimates that the requested "revenue price-out" would  
25 consume a minimum of 80 hours of CPA time at \$195/hour, for a total of at least \$16,000; and  
26 a minimum of 100 hours of Stericycle accounting staff time at an average cost of about

1 \$80/hour, for a total of at least \$8,000. The work involved would probably take at least two  
2 months, given the existing workloads of the personnel involved.

3 This is not a proceeding to evaluate Stericycle's rates nor is it an appropriate forum for  
4 such an evaluation. Stericycle does not agree that Waste Management's speculation that  
5 Stericycle is "over earning" on its tariff rates creates an issue that is relevant to this application  
6 proceeding. The fact is that Stericycle rates and charges are specified in a tariff approved by  
7 the Commission and therefore are presumed reasonable for purposes of this proceeding. We do  
8 not believe that charging Commission-approved tariff rates is or could be evidence that  
9 Stericycle will not provide service to the satisfaction of the Commission or that granting  
10 overlapping authority to Waste Management is in the public interest. The Commission has  
11 never granted overlapping authority for the purpose of fostering price competition and its rate-  
12 setting authority (and responsibility) under RCW Chapter 81.77 is entirely inconsistent with  
13 any alleged "need" to promote rate competition.

14 If Stericycle's rates are unreasonable, the Commission's remedy under RCW Chapter  
15 81.77 is not to grant overlapping authority to Waste Management but to require Stericycle to  
16 charge reasonable rates and the appropriate mechanism to do this is a rate case. A rate case and  
17 a related audit by the Commission Staff involve procedures appropriate for rate setting but for  
18 which the present proceeding is plainly not adapted. The reasonableness of Stericycle's rates is  
19 not an issue in this application proceeding.

20 Stericycle further objects to the extent this data request seeks information prior to 2011.  
21 Judge Kopta's guidance with respect to Waste Management's data requests to the WRRRA  
22 protestants was that data earlier than 2011 was unnecessary and therefore unreasonably  
23 burdensome.

24 Persons with knowledge: Mike Philpott, John Suchla, Nanette Walker.

25 **DATA REQUEST NO. 3:** Produce a detailed depreciation schedule listing all assets  
26 used to provide WUTC-regulated biomedical services in Washington.

1           **SUPPLEMENTAL RESPONSE:** Waste Management has modified this request,  
2 asserting that the detailed depreciation schedule provided by Stericycle initially “is insufficient  
3 for us to determine whether Exhibit DR#3 [Stericycle’s depreciation schedule] is complete  
4 without a further response to Data Request No. 1. Production of the 2011 balance sheet . . .  
5 will provide us the necessary information.” Letter from Jessica Goldman to Stephen Johnson,  
6 July 17, 2012. However, the argument that the type of summary information contained in a  
7 balance sheet will allow Waste Management to determine whether Stericycle’s previously-  
8 provided depreciation schedule is “complete” is a non sequitur. Waste Management has no  
9 reason to think that Stericycle’s depreciation schedule is not complete and a balance sheet  
10 would add nothing beyond summary the amounts shown on the depreciation schedule.

11           Stericycle also objects to Waste Management’s request for a balance sheet for the  
12 reasons stated above in response to Data Request No. 1 and in this Supplemental Response to  
13 Data Request No. 3.

14           Persons with knowledge: Mike Philpott, John Suchla, Nanette Walker.

15           **DATA REQUEST NO. 4:** Describe specifically the methodology used to determine  
16 any overhead charges to your WUTC-regulated biomedical waste operation. For all overhead  
17 allocations, provide calculations in electronic format supporting the methodology.

18           **SUPPLEMENTAL RESPONSE:** See prior response.

19           **DATA REQUEST NO. 5:** Describe specifically the methodology and allocation  
20 factors you use to separate common expenses for WUTC-regulated and other, non-regulated  
21 operations.

22           **SUPPLEMENTAL RESPONSE:** See prior response.

23           **DATA REQUEST NO. 6:** Identify any persons or entities which have an affiliated  
24 interest (as that term is defined in RCW 80.16.010) with your regulated biomedical operations.

25           **SUPPLEMENTAL RESPONSE:** See prior response.  
26



1 **DATA REQUEST NO. 7:** Produce contracts and any other documents reflecting  
2 arrangements or transactions between you and any affiliated interest (as that term is defined in  
3 RCW 80.16.010). If no documents are available, state a summary of the services provided and  
4 the prices or values paid.

5 **SUPPLEMENTAL RESPONSE:** Stericycle, Inc. provides waste treatment and  
6 disposal and sales, general and administrative services to Stericycle. Stericycle confirms that it  
7 has no contracts or other documents describing these arrangements.

8 The amount charged annually for treatment and disposal of Washington regulated waste  
9 is the percentage of the total costs of Stericycle, Inc.'s Morton plant equal to the percentage of  
10 the waste containers delivered to Stericycle, Inc. at Morton for treatment and disposal that is  
11 collected from Washington customers in regulated service. The amounts allocated to Stericycle  
12 for waste treatment and disposal are as stated in Stericycle's annual reports to the Commission.

13 The total costs of Stericycle, Inc.'s Morton plant in 2011 and 2012 (through June 30,  
14 2012) are as follows:

15 2011: To be provided

16 2012 (5/31): To be provided

17 The total volumes of waste handled at Stericycle, Inc.'s Morton plant in 2011 and 2012 and  
18 total volumes of waste handled at the Morton plant for Washington generators in regulated  
19 service are as follows:

	<u>Total</u>	<u>Washington</u>
20 2011:	653,484 containers	484,143 containers
21 2012 (5/31):	To be provided	To be provided

22 In addition to waste treatment and disposal services, Stericycle, Inc. provides sales,  
23 general and administrative (SG&A) services to Stericycle of Washington, Inc, including:  
24 Customer payment processing. Credit checking and delinquent account collections. Cash  
25 management and treasury services. Investor relations and shareholder communications. SEC  
26

1 compliance and reporting. Procurement services. Information technology services.  
2 Management of 800 number and related customer service matters. Marketing. Real estate  
3 services. Accounting services and GAAP compliance. Federal, state and local tax compliance.  
4 Accounts payable processing. Payroll and benefits administration. Human resource services.  
5 Workers' compensation administration. Risk management (insurance) administration. Safety  
6 program support services. Engineering services. Federal and state environmental regulatory  
7 compliance. Legal services.

8 Stericycle, Inc.'s consolidated SG&A expenses are allocated to Stericycle of  
9 Washington, Inc. in proportion to Stericycle of Washington's revenues. These amounts are  
10 then allocated between Stericycle's regulated and non-regulated services in proportion to the  
11 revenues earned from such services, respectively. The amounts allocated to Stericycle's  
12 regulated services are the amounts reported as SG&A expense in Stericycle's annual reports to  
13 the Commission.

14 Persons with knowledge: Mike Philpott, Nanette Walker, John Suchla.

15 **DATA REQUEST NO. 8:** Produce your WUTC annual reports for 1995, 2001, 2009,  
16 2010, and 2011.

17 **SUPPLEMENTAL RESPONSE:** The annual reports for 2001, 2009, 2010 and 2011  
18 were previously produced. The fee calculation schedules for 2009, 2010 and 2011 are  
19 produced herewith at Supplemental Exhibit DR#8. The fee calculation schedule for 2001 was  
20 previously produced with the 2001 annual report. Stericycle is unable to locate a copy of the  
21 1995 fee calculation schedule but it may be available to Waste Management from the  
22 Commission.

23 **DATA REQUEST NO. 9:** State the proportion or amounts of the rates currently  
24 charged under your Tariff No. 1 which relate to the cost of processing biomedical waste at your  
25 affiliated processing facility in Morton, Washington.

26 **SUPPLEMENTAL RESPONSE:** See prior response.

1           **DATA REQUEST NO. 10:** Produce the income statements for your affiliated  
2 processing facility in Morton, Washington for 2009, 2010, 2011, and 2012 (to date).

3           **SUPPLEMENTAL RESPONSE:** See prior response. Without waiving its objections,  
4 Stericycle has disclosed 2011 and 2012 cost information for Stericycle, Inc.'s processing  
5 facility at Morton in its Supplemental Response to Data Request No. 7.

6           **DATA REQUEST NO. 11:** State how much your labor, fuel and other operational  
7 costs have increased since your Tariff No. 1 was initially adopted and describe specifically  
8 your method for deriving the amount of the increases.

9           **SUPPLEMENTAL RESPONSE:** See prior response.

10          **DATA REQUEST NO. 12:** State why you have never filed a change in base service  
11 rates.

12          **SUPPLEMENTAL RESPONSE:** The Commission regulates the rates of solid waste  
13 collection companies. The analysis used by the Commission to set rates for solid waste  
14 collection companies limits the amount of permissible profit to a range. Because Stericycle's  
15 profits from its regulated services have generally fallen within that range, Stericycle has not  
16 viewed rate increases as necessary or advantageous. Stericycle has been able to keep its profits  
17 within the permissible range, notwithstanding increased costs, by expanding its services and  
18 increasing the efficiency of its operations. Even if an incremental increase in its rates might be  
19 permissible, Stericycle has in the past concluded that the benefit of any added profit did not  
20 justify the costs that would be incurred in a general rate increase proceeding.

21          Persons with knowledge: Mike Philpott, Nanette Walker.

22          **DATA REQUEST NO. 13:** Provide a detailed comparison of rates for services under  
23 your Tariff No. 1 to rates for similar services in Oregon, California, and Idaho.

24          **SUPPLEMENTAL RESPONSE:** See prior response.

25          **DATA REQUEST NO. 14:** State the volume of biomedical waste you collected in  
26 Washington in 1995, 2001, 2009, 2010, 2011, and 2012 (to date), respectively.



1 **SUPPLEMENTAL RESPONSE:** See prior response. Stericycle has previously  
2 provided information concerning the volume of biomedical waste it collected in Washington in  
3 2011 and 2012 through 5/31/2012. Stericycle's understanding of Judge Kopta's guidance with  
4 respect to discovery is that the production of earlier data will not be required in this proceeding.

5 **DATA REQUEST NO. 15:** State the volume of biomedical waste you collected in  
6 Washington in 2009, 2010, 2011, and 2012 (to date), respectively, which waste was generated  
7 in territory where you were the only service provider.

8 **SUPPLEMENTAL RESPONSE:** See prior response. Waste Management modified  
9 this data request per Jessica Goldman's letter of July 17, 2012 to instead request that Stericycle  
10 provide data concerning the volume of biomedical waste collected in Washington from "the  
11 locations and generators identified in footnotes 13 and 15 of Waste Management's Opening  
12 Brief on Preliminary Legal Issue (filed June 14, 2012), plus the cities of Bellingham and Moses  
13 Lake." Without waiving its prior objections, Stericycle provides data for the volume of waste it  
14 collected from the counties identified in footnote 13, plus Bellingham and Moses Lake, as  
15 follows:

<u>2011</u>	<u>2012 (5/31)</u>
<u>106,488 containers</u>	<u>44,191 containers</u>

18 Stericycle understands that the counties identified in footnote 13, plus Bellingham and Moses  
19 Lake, are a proxy for the territory in which Waste Management believes Stericycle is the only  
20 medical waste service provider and, accordingly, Stericycle believes the information provided  
21 in this supplemental response is fully responsive to this data request. Counsel for Waste  
22 Management was unable to explain the relevance of the requested information for the more  
23 than 50 hospitals referenced in footnote 15 to the issues in this proceeding or the relationship of  
24 this request to the original data request. Some of the hospitals listed in footnote 15 are within  
25 the territory covered by Waste Management's existing authority. Stericycle does not believe  
26

1 Waste Management's request for the footnote 15 generator data falls within any reasonable  
2 interpretation of this data request and therefore declines to provide the requested data.

3 Persons with knowledge: Mike Philpott. John Suchla.

4 **DATA REQUEST NO. 16:** State the volume of biomedical waste you collected, and  
5 the number of customers from whom you collected such waste, within each Washington  
6 county, respectively, in 1995, 2001, 2009, 2010, 2011, and 2012 (to date), respectively.

7 **SUPPLEMENTAL RESPONSE:** Waste Management has modified this data request  
8 and now requests the data for the volume of waste collected by Stericycle and the number of  
9 Stericycle's customers by zip code. Letter of Jessica Goldman to Stephen B. Johnson, dated  
10 July 17, 2012. Stericycle objects to this new request on the grounds that it seeks detailed  
11 confidential and proprietary business information about Stericycle's customers for an improper  
12 competitive purpose; i.e., the information would allow Waste Management to focus its  
13 marketing efforts on Stericycle's most valuable customers. Waste Management has not  
14 explained how the volume of waste and number of customers by zip code is relevant to any  
15 matter at issue in this proceeding. The information sought in the level of detail requested is  
16 irrelevant to any matter at issue in this proceeding and is not reasonably calculated to lead to  
17 the discovery of relevant, admissible evidence.

18 **DATA REQUEST NO. 17:** Identify by name and address each facility to which you  
19 transported or arranged to have transported biomedical waste generated in Washington in 2009,  
20 2010, 2011, and 2012 (to date), respectively, and as to each such year, identify the volume of  
21 biomedical waste you tendered to each such facility.

22 **SUPPLEMENTAL RESPONSE:** See prior response. Without waiving its objections,  
23 Stericycle confirms that it has not transported WUTC-regulated Washington waste to Covanta  
24 in 2010, 2011 or 2012.

25 **DATA REQUEST NO. 18:** State the number of customers you served in Washington  
26 in 1995, 2001, 2009, 2010, 2011, and 2012 (to date), respectively.

1           **SUPPLEMENTAL RESPONSE:** See prior response.

2           **DATA REQUEST NO. 19:** State the number of customers for whom you provided  
3 services at more than one affiliated facility in Washington in 2009, 2010, 2011, and 2012 (to  
4 date), respectively.

5           **SUPPLEMENTAL RESPONSE:** See prior response.

6           **DATA REQUEST NO. 20:** Produce all documents which discuss, refer to or reflect a  
7 customer complaint made to you or about your service since January 1, 2009.

8           **SUPPLEMENTAL RESPONSE:** Stericycle has no documents in its possession or  
9 control that discuss, refer to or reflect “customer complaints” since January 1, 2009. Similar to  
10 Waste Management, as described in Jessica Goldman’s letter to counsel for Stericycle of July  
11 25, 2012, Stericycle operates a national call center for customer calls throughout the United  
12 States. Calls received from Washington customers are logged but none of the categories used  
13 refer to “complaints.” We do not believe that any information contained in these call center  
14 logs is relevant to any matter at issue in this case; or, if marginally relevant, would justify the  
15 cost and expense of reviewing and interpreting the log entries to determine if they reflect  
16 something that Waste Management would view as a “complaint,” rather than an ordinary  
17 customer inquiry or service request. As counsel for Waste Management stated in her letter to  
18 counsel for Stericycle of July 25, 2012 with respect to Stericycle’s request for complaints  
19 against Waste Management, “To the degree there are any relevant complaints about Waste  
20 Management’s services, those complaints are available from the Commission.” The same is  
21 true for Stericycle. The WUTC record reflects six (6) complaints about Stericycle’s services  
22 since 1992. The WUTC record reflects over 500 complaints against Waste Management since  
23 2001.

24           **Persons with knowledge:** Mike Philpott, Stephen B. Johnson.



1           **DATA REQUEST NO. 21:** Produce all documents which discuss, refer to or reflect a  
2 customer complaint made about service at your affiliated processing facility in Morton,  
3 Washington since January 1, 2009.

4           **SUPPLEMENTAL RESPONSE:** See prior response and Supplemental Response to  
5 Data Request No. 20.

6           **DATA REQUEST NO. 22:** Produce all documents which discuss, refer to or reflect  
7 your violation, alleged violation, or investigation of a possible violation, of any law, regulation,  
8 ordinance, or government rule since January 1, 2009 in performing WUTC-regulated collection  
9 services. Produce the same from operating your affiliated processing facility in Morton,  
10 Washington.

11           **SUPPLEMENTAL RESPONSE:** See prior response. Without waiving its objections,  
12 Stericycle produces the additional documents set out in Supplemental Exhibit DR#22.

13           **DATA REQUEST NO. 23:** Produce all documents which discuss, refer to or reflect  
14 your efforts to make your services known and to attract business throughout Washington since  
15 January 1, 2009 including, without limitation, copies of all yellow pages advertising.

16           **SUPPLEMENTAL RESPONSE:** See prior response.

17           Persons with knowledge: Mike Philpott, Ron Adams, Bill Avery, James Ryan.

18           **DATA REQUEST NO. 24:** Describe the containers you provide to your customers to  
19 serve as repositories of biomedical waste including, without limitation, stating the sizes of the  
20 containers, the manufacturers of the containers, how long you have been using the containers,  
21 and where in Washington you provide each such container to customers.

22           **SUPPLEMENTAL RESPONSE:** See prior response. Without waiving its objections,  
23 Stericycle provides additional information about the containers it currently uses as shown in  
24 Supplemental Exhibit DR#24.

25           Persons with knowledge: Mike Philpott, Chris Dunn.  
26



1 **CERTIFICATE OF SERVICE**

2 I, Vickie L. Owen, certify under penalty of perjury under the laws of the State of  
3 Washington that, on July 27, 2012, I caused to be served on the person(s) listed below in the  
4 manner shown a copy of STERICYCLE'S SUPPLEMENTAL RESPONSES TO WASTE  
5 MANAGEMENT'S DATA REQUESTS:

6 Jessica Goldman  
7 Polly L. McNeill  
8 Summit Law Group  
9 315 - 5<sup>th</sup> Avenue South  
10 Seattle, WA 98104  
11 [jessicag@summitlaw.com](mailto:jessicag@summitlaw.com)  
12 [pollym@summitlaw.com](mailto:pollym@summitlaw.com)  
13 [kathym@summitlaw.com](mailto:kathym@summitlaw.com)  
14 [deannas@summitlaw.com](mailto:deannas@summitlaw.com)

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,  
Postage Prepaid
- Via Email


11 James K. Sells  
12 Attorney at Law  
13 PMB 22, 3110 Judson Street  
14 Gig Harbor, WA 98335  
15 [jamesells@comcast.net](mailto:jamesells@comcast.net)  
16 [cheryls@rsulaw.com](mailto:cheryls@rsulaw.com)  
17 *Attorney for Protestant WRRRA, Rubatino,*  
18 *Consolidated, Murrey's and Pullman*

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,  
Postage Prepaid
- Via Email

16 Fronda Woods  
17 Office of the Attorney General  
18 Utilities and Transportation Division  
19 1400 S. Evergreen Park Drive SW  
20 PO Box 40128  
21 Olympia, WA 98504-0128  
22 (360) 664-1225  
23 (360) 586-5522 Fax  
24 [fwoods@utc.wa.gov](mailto:fwoods@utc.wa.gov)  
25 [BDeMarco@utc.wa.gov](mailto:BDeMarco@utc.wa.gov)

- Via Legal Messenger
- Via Facsimile
- Via U.S. Mail, First Class,  
Postage Prepaid
- Via Email

26 Dated at Seattle, Washington this 27<sup>th</sup> day of July, 2012.

  
\_\_\_\_\_  
Vickie L. Owen  
[vowen@gsblaw.com](mailto:vowen@gsblaw.com)



# Exhibit 6

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of:

**WASTE MANAGEMENT OF WASHINGTON,  
INC. D/B/A WM HEALTHCARE SOLUTIONS  
OF WASHINGTON**

For an Extension of Certificate G-237 for a  
Certificate of Public Convenience and Necessity  
to Operate Motor Vehicles in Furnishing Solid  
Waste Collection Service

Docket No. TG-120033

**WASTE MANAGEMENT'S OPENING  
BRIEF ON PRELIMINARY LEGAL  
ISSUE**

1 Disposal in a small portion of Murrey's Pierce County territory and with Protestant Rubatino Refuse  
2 Removal in annexation territories around Everett.<sup>12</sup>

3 4. Numerous biomedical waste generators in Washington have only one option for the  
4 collection of such waste: Stericycle. There are 22 counties where Stericycle is the only authorized  
5 biomedical waste hauler.<sup>13</sup> In major portions of nine other counties and the cities of Bellingham and  
6 Moses Lake, Stericycle also is the only game in town.<sup>14</sup> At least 52 Washington hospitals, large and  
7 small, have no choice of service provider other than Stericycle.<sup>15</sup> There are at least eight hospital  
8 groups with hospitals both inside the Certificate No. G-237 territory – where there presently is  
9 competition between Waste Management and Stericycle – and in the remaining territory – where only  
10 Stericycle may collect biomedical waste.<sup>16</sup> Those groups which logically wish to contract with a single  
11 Washington biomedical waste collection service currently have one choice: Stericycle.

12 5. In the pending application, Waste Management has requested permission to expand its  
13 services to provide biomedical waste collection service in the territories where the incremental  
14

---

15 <sup>12</sup> Declaration of Jeff Norton in Support of Waste Management's Opening Brief on Preliminary Legal Issue ("Norton Decl.")  
16 ¶ 2.

17 <sup>13</sup> These counties are: Okanogan, Ferry, Stevens, Pend Oreille, Asotin, Garfield, Columbia, Walla Walla, Franklin, Yakima,  
18 Klickitat, Skamania, Clark, Cowlitz, Wahkiakum, Pacific, Lewis, Thurston, Grays Harbor, Jefferson, Clallam, and San Juan.  
19 See Goldman Decl. Exs. 1-2; *In re Waste Mgmt. of Wash., Inc.*, Docket TG-120033, Protest of Wash. Refuse & Recycling  
20 Ass'n, et al., Attachments (Feb. 17, 2012).

21 <sup>14</sup> These counties are: Whatcom, Chelan, Lincoln, Spokane, Whitman, Adams, Benton, Mason, and Island. See Goldman  
22 Decl. Exs. 1-2; *In re Waste Mgmt. of Wash., Inc.*, Docket TG-120033, Protest of Wash. Refuse & Recycling Ass'n, et al.,  
23 Attachments (Feb. 17, 2012).

24 <sup>15</sup> These hospitals include Lourdes Medical Center in Pasco, Madigan Army Medical Center in Fort Lewis, Grays Harbor  
25 Community Hospital in Aberdeen, Island Hospital in Anacortes, Okanogan Douglas District Hospital in Brewster, Forks  
26 Community Hospital, Mark Reed Hospital in McCleary, Morton General Hospital in Cowlitz, Garfield District Hospital in  
27 Pomeroy, Jefferson General Hospital in Port Townsend, United General Hospital in Sedro Woolley, Snoqualmie Valley  
28 Hospital, Willapa Harbor Hospital in South Bend, Sunnyside Community Hospital, Yakima Valley Memorial Hospital, Mid  
Valley Hospital in Omak, Allenmore Hospital in Tacoma, Mary Bridge Children's Hospital and Health Center in Tacoma,  
Tacoma General Hospital, US Navy Hospital in Oak Harbor, Overlake Hospital Medical Center in Bellevue, Saint Joseph  
Hospital in Bellingham, Lake Chelan Community Hospital, Whidbey General Hospital in Coupeville, Lincoln Hospital in  
Davenport, Coulee Community Hospital, Saint Joseph Medical Center in Longview, Samaritan Hospital in Moses Lake,  
Newport Community Hospital, Odessa Memorial Hospital, Quincy Valley Medical Center, Ferry County Memorial Hospital  
in Republic, East Adams Rural Hospital in Ritzville, Mason General Hospital in Shelton, North Valley Hospital in Tonasket,  
Centralia Hospital, Saint Joseph's Hospital in Chewelah, Whitman Hospital in Colfax, Mount Carmel Hospital in Colville,  
Saint Peter Hospital in Olympia, Swedish Hospital-Edmonds, Olympic Memorial Hospital in Port Angeles, Fairfax Hospital  
in Kirkland, VA Puget Sound-American Lake in Lakewood, VA Southwest Washington in Vancouver, Saint Elizabeths  
Hospital-Enumclaw, Saint Anthony Hospital in Gig Harbor, Saint Clare Hospital in Lakewood, Saint Joseph Medical Center  
in Tacoma, Capital Medical Center in Olympia, Toppenish Community Hospital, and Yakima Regional Medical Center,  
Norton Decl. ¶ 3.



1 DATED this 14th day of June, 2012.

2 SUMMIT LAW GROUP PLLC

3  
4 By 

5 Polly L. McNeill, WSBA #17437  
6 Jessica L. Goldman, WSBA #21856  
7 pollym@summitlaw.com  
8 jessicag@summitlaw.com

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Attorneys for Waste Management of  
Washington, Inc.*

# Exhibit 7



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

July 6, 2010

Mr. Ross Wilson  
Stericycle, Inc. Morton  
20320 80<sup>th</sup> Avenue South  
Kent, WA 98032

**RE: Dangerous Waste Compliance Inspection on June 1, 2010 at Stericycle-Morton  
RCRA ID Number WAH000036544**

Dear Mr. Wilson:

Ecology's Hazardous Waste and Toxics Reduction Program recently conducted a Dangerous Waste compliance inspection at your facility. The Dangerous Waste Regulations<sup>1</sup> establish a safe and responsible system to manage dangerous waste. The violations found at Stericycle-Morton are listed and summarized in the enclosed Notice to Comply. You must complete the actions needed to correct these violations and send the enclosed completed **Compliance Certificate** within 30 days of receipt of this letter to the address above.

Failure to comply with these requirements within 30 days of receipt of this letter could result in an administrative order and/or a penalty of up to \$10,000 per day for each violation.

If you have any questions or need clarification of the Notice to Comply, please contact me at 360-407-6242 or nbro461@ecy.wa.gov.

Sincerely,

Nannette Brooks  
Hazardous Waste Compliance Inspector

**By Certified Mail**  
7008 2810 0001 3940 8931


Enclosure: Inspection Report  
cc Mark Couch, Stericycle Morton  
Steve Garrett, Lewis County  
Gerry Strawn, Southwest Clean Air Authority  
Penny Ingram, UTC  
Pat Bailey, Ecology  
Marc Pacifico, Ecology  
Don Reif, Ecology  
Al Salvi, Ecology

<sup>1</sup> Authority: WAC 173-303 and RCW 70.105.080



RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

### Notice to Comply

Site contact name and title Mark Couch, Plant Manager	Inspector's Name Nannette Brooks 
Site phone number 360-496-5988	Inspector's Phone Number 360-407-6242
Site contact e-mail address mcouch@stericycle.com	Inspector's e-mail address nbro461@ecy.wa.gov
Site Website	Back-up Inspector's Name Leslie Morris & Tom Cusack

**Notes:**

1. A re-inspection can occur at any time to verify the correction of the violations listed below.
2. Ecology may take formal enforcement action even if the violation(s) are corrected.
3. You will find a list of the items Ecology reviewed for compliance during the inspection on the enclosed Checklist Summary of Violations.

Violation Code: WAC 173-303- & Summary of Violations Including Observations	Actions Needed
<p>WAC 173-303-170(1) and by reference 070(3): Failure to designate waste according to required procedures.</p> <p>OBSERVATIONS:</p> <ul style="list-style-type: none"> <li>• Containers of liquids (partially dispensed syringes, vials containing liquid, and bottles containing liquid) visible inside the sharps containers and the pre-autoclave waste bin.</li> <li>• Liquids were released to the floor after the autoclave process. Floor drains in the area of the building convey liquids to the drain system that eventually discharges to the local POTW.</li> </ul>	<p><b>Action Required:</b> When returning the enclosed Compliance Certificate, provide a Sampling and Quality Assurance Plan (SQAP), for designation of the solid wastes accepted inside the sharps containers and the liquids released to the floor from the autoclave units. Ensure that your SQAP includes sampling and analysis for state only criteria of toxicity and persistence.</p> <p>After submission of the SQAP, Ecology will provide comments. After which time, Stericycle will have 30 days to complete the plan and submit documentation that shall at least include copies of the analytical results of designation testing and any contracts with testing laboratories.</p>
Request for Additional Information	
<p>WAC 173-303-220 (3) Additional Reports</p> <p>OBSERVATIONS:</p>	<p><b>Action Required:</b> Please provide information in the form of a statement</p>

RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

<p>After waste has been treated in the autoclave processing area, it is removed by a forklift and placed into a compactor. The waste is compacted in preparation for transported for disposal.</p>	<p>and any supporting documentation such as photos, copies of manifests/disposal records or receipts, treatment logs or process flow charts, indicating how liquids are managed from the compactor.</p>
--	---

RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

## Compliance Certificate

**Instructions:**

1. Complete this page **within 30 days of the receipt of the letter.**  
**Note:** You may request an extension before this Compliance Certificate is due. You must make this request in writing and include the reason for the extension and propose a new date of completion.
2. Send this page with any supporting documentation such as photos, copies of manifests/disposal records or receipts, and if applicable, your request for extension, to:

Nannette Brooks  
 Department of Ecology  
 PO Box 47775, Olympia, WA 98504-7775

Summary of Hazardous Waste Violation Compliance Action				
Check the type of documentation provided				
Violation Code	Photo	Paperwork	Statement	Notes
170(1) and by reference 070(3):				
<b>Request for Additional Information</b>				
220 (3)				

1. I certify that the violations noted on the Notice to Comply page have been corrected.
2. I personally examined any attached documentation submitted as proof of compliance and I believe the information to be true, accurate, and complete.
3. I am aware:
  - There are significant penalties for submitting false information and/or for non-compliance with regulations.
  - My signature **certifies compliance** with every regulation noted on the Notice to Comply page.
4. I declare under penalty of perjury the foregoing certification is true and correct.

Signature	Printed name
Position/title	Date



RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

## Inspection Report

Background: Stericycle. Inc. LLC Rx Waste Compliance offers the following services to the medical service industry: Characterization, segregation, transportation and proper disposal of medical waste. The medical waste stream includes sharps, drugs, blood, syringes, bedding, bandages, infectious wastes and vials. The Morton facility processes approximately 1.7 million pounds of medical waste per month.

Our Ecology inspection team was Nannette Brooks and Leslie Morris from the Southwest Regional Hazardous Waste and Toxics Reduction Program and Tom Cusack with the Headquarters Hazardous Waste and Toxics Reduction Program. We arrived at 10:25 a.m. and met with Mark Couch, the site's Plant Manger.

### Introductory conference:

Before touring the facility, we had an introductory conference and paperwork review. Mark Couch, the Plant Manager has been at the location for about 15 months and is still learning the dangerous waste rules.

Stericycle applied for the EPA RCRA Site ID number because a shipment of unused chemicals was sent to the Morton facility from a sister facility in Canada. At the Morton facility it was determined that 450 pounds of the shipment was a dangerous waste. They contracted with Kleen Environmental Technologies, Inc. to ship the dangerous waste to Burlington Environmental, Inc. in Kent Washington.

In the past, there have been small amounts of dangerous waste that have made it to the Morton facility. The procedure is to contact the original generator. The original generator will have to make alternate arrangements to transport and dispose of the waste stream. Twice in the last twelve months, unidentified dangerous waste was transported to the Morton facility. Determination of the origins of the dangerous waste could not be made. The waste was shipped offsite using the CESQG rules prior to April 2010. Due to the possible exposure risks, containers are only scanned at the facility. Visual inspections are not part of the protocol, even when possible. It is expected that the generator has verified their waste streams in the appropriate container.

The Morton facility receives the red sharps containers for processing from various medical facilities. The containers are to be expected to only contain bio-hazardous solid waste. No dangerous waste should be present. Containers provided to their clients for dangerous waste accumulation are black or purple and are not supposed to be shipped to the facility.

Shipments to the facility are collected at "hubs" in both eastern and western Washington.

### Site Visit:

#### Biosystems Processing Area:

Wastes stored in this area have been weighed and scanned for tracking purposes before being staged for processing. Unprocessed bins of pharmaceutical wastes, biomedical wastes and "dual wastes" in

RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

Sharps Containers are staged before processing on multi-level carts. Each cart has documentation to show where the waste originated. We observed the waste packaged in semi-clear red containers. Each cart stored approximately 70 of these containers. During one week's time, the facility processes approximately 350 of these carts. Once the Sharps Containers pass the radiation meter, no other inspections of the bins, including visual, are conducted. Sealed containers are taken from the staging carts and loaded onto a conveyer belt, the Dumper. The containers travel on this belt to an area where robotic arms open the containers. At this stage the contents are emptied into the large metal treatment bins that will be processed in the autoclave. The containers exit the Dumper and are then put into a washer.

During our inspection of the pre-staged red plastic sharps containers, Ecology performed a visual inspection of randomly chosen containers. Multiple containers held partially full hypodermic syringes with unknown dark liquids and clear liquids, vials still containing liquids, and one container held a manufacturer's pre-labeled bottle of a dark liquid.

A full treatment bin was moved from under the robotic conveyer belt to an area next to the non-sharps waste bin filling area before being treated in one of the autoclave units. Ecology looked at the contents of this treatment bin and observed that the waste stream being stored in the treatment bin contained partial full hypodermic syringes with unknown liquids and vials still containing liquids.

#### Autoclave Processing Area:

Condensation from the autoclave sterilization procedure is to be captured by a hood and vented to the outside.

Treatment bins from the Biosystems area are moved by forklift from the staging area to one of two autoclave units. Once the treatment bins fill the autoclave unit, the waste is treated with heat and 40 pounds of pressure per square inch for a pre-determined amount of time. After treatment the bins are removed by forklift and moved to the compactor. Ecology observed liquids escaping Autoclave #2 as a worker removed the bin with a forklift. A steady stream of liquid flowed on to the floor. Liquids on the floor collect in a drain that leads to a series of grinder pumps before collecting in an outdoor waste water vault which is pumped two or three time a day to the local Publicly Owned Treatment Works (POTW). The treated waste is then compacted. After compaction, the waste is loaded into a trailer. The waste will be then transported to the Roosevelt Regional Landfill in Klickitat County.

The area had a posted list of emergency procedures and numbers. The past emergency coordinator was listed as the contact. Mr. Couch told me the facility was updating the posted phone numbers that day.

#### Waste Bin Filling Area:

At this area, the non-sharps waste bins are filled with plastic bags of untreated waste. We were told the contents are primarily soiled linens and other contaminated cloth articles. These bags are opaque red and opaque yellow, therefore contents could not be inspected visually. We were also told that the yellow bags were not chemotherapy waste streams, but biohazard wastes from Canada where yellow is used instead of red.

RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

Container Storage Area:

Sharps containers that have been cleaned and sterilized are stored in the area. These containers are for distribution to their clients.

Waste Off Loading/Dock:

Each dock will accommodate a waste stream that goes to a specific destination. The type of waste stream determines the destination location. Solid waste will be sent to the Roosevelt Landfill in Klickitat County in Washington. Pharmaceutical waste streams that are to be incinerated will either be transported to a Stericycle facility in Brooks, Oregon or Salt Lake City, Utah. Scanning for chain of custody purposes and destruction notices for clients happen in the Waste Off-Loading/Dock area.

The Cooler Room:

The Cooler is a room used to store rejected loads of waste and would serve as the accumulation area for dangerous waste. Rejected loads of unacceptable waste can be radioactive. The Ecology action level to leave an area of radioactive exposure is 2 millirems per hour. Inspectors did not have radiation monitoring equipment, therefore did not inspect this room.

Out Briefing:

We discussed our concerns about the multiple containers that held partial full hypodermic syringes with unknown dark liquids and clear liquids, vials still containing liquids, and one container that held a manufacturer's pre-labeled bottle of a dark liquid. We also saw the same type of wastes in the waste bin that was pre-staged for treatment in the auto-clave unit.

PHOTOS       Yes     No  
 SAMPLES     Yes     No

Dangerous Waste(s) Observed	Location	Amount on-site	Monthly	Annually
Multiple sharps containers with undesignated waste inside	Biosystems Processing Area			
Treatment bin (pre-auto-clave)	In between the Biosystems Processing Area and the Autoclave processing Area			



RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

### Disposal Records

(If additional space is needed, use continuation sheet.)

Manifest number	Date	Hauler Name	Waste/Waste Codes	Comments	LDRs	Copy Received?	Amount
1105189-15119	8-21-09	Heritage Transport LLC	Flammables & Toxics	Pharmaceutical aerosols, nicotine cumadin, humalin		X 9-16-09	47lbs
000359698 VES	2-1-10	Veolia ES Technical Solutions	D001	Fireworks Shipment occurred during CESQG status			24lbs
08170	4-15-10	Kleen Environmental	Material not reg. by DOT	Non-hazardous waste manifest			1675 lbs
005845224 JJK	5-25-10	Kleen Environmental	WTO2	Cidex OPA, HGB reagent, WBC reagent part B			450 lbs

RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

**CHECKLIST SUMMARY OF VIOLATIONS**  
Applicable to All Generators

WAC Code 173-303-	Facility status is evaluated for each item on this Checklist as follows: V=Violation Noted PV=Previous Violation (from previous inspection)	Facility Status		
		V	PV	
Used Oil and Antifreeze	515	Requirements for burning used oil for energy recovery were met.	<input type="checkbox"/>	<input type="checkbox"/>
	515(4)	Used oil managed as on-spec meets the used oil specification standards.	<input type="checkbox"/>	<input type="checkbox"/>
	515(5)(e)	Used oil mixed with dangerous waste is managed as dangerous waste.	<input type="checkbox"/>	<input type="checkbox"/>
	515(6)	Containers or tanks of used oil labeled with the words "Used Oil." [by ref 40 CFR Part 279.22(c)(1)]	<input type="checkbox"/>	<input type="checkbox"/>
	515(6)	Oil spills cleaned up. [by ref 40 CFR Part 279.22(d)]	<input type="checkbox"/>	<input type="checkbox"/>
	515(6)(a)(i)	Containers of used oil kept closed except to add or remove used oil.	<input type="checkbox"/>	<input type="checkbox"/>
	515(6)(b)	If used oil is managed in a manner that poses a threat to human health and the environment, secondary containment is provided.	<input type="checkbox"/>	<input type="checkbox"/>
	522(2)(a)	Antifreeze containers labeled "Spent Antifreeze" and stored in a manner to prevent spills (for example, compatible containers, on impermeable surfaces or in secondary containment structures)	<input type="checkbox"/>	<input type="checkbox"/>
Universal Waste	SQHUW: <11K lbs. UW & <2.2K lbs Lamps	-573(9): UW managed in a way that prevents releases to the environment.	<input type="checkbox"/>	<input type="checkbox"/>
		-573(10): UW waste properly labeled or marked "Universal Waste," "Waste", or "Used" followed by the words "Battery(ies)," "Mercury" or "Lamps."	<input type="checkbox"/>	<input type="checkbox"/>
		-573(11): UW may only be accumulated for up to one year and documentation of storage time provided, except as noted in -573(11)(b).	<input type="checkbox"/>	<input type="checkbox"/>
	LQHUW: >11K lbs. UW or >2.2K lbs Lamps	-573(20): UW managed in a way that prevents releases to the environment.	<input type="checkbox"/>	<input type="checkbox"/>
		-573(21): UW waste properly labeled or marked "Universal Waste," "Waste," or "Used" followed by the words "Battery(ies)" "Mercury" or "Lamps."	<input type="checkbox"/>	<input type="checkbox"/>
	-573(22): UW may only be accumulated for up to one year, except as noted in -573(22)(b). Documentation must exist to demonstrate that the time limits have been met.	<input type="checkbox"/>	<input type="checkbox"/>	

**Conditionally Exempt SQG Requirements: SQG generates <220 lbs (100kg; 27 gal) per month DW or <2.2 lbs (1 kg) per month of EHW; stores <2,200 lbs (1,000 kg; 270 gal) on site and <2.2 lbs (1 kg) per month of EHW**

CESQGs	070(8)	Quantity of DW on site below the regulatory threshold (2,200 lbs) and assurance was available for delivery of CESQG waste to a TSD, MRW, or recycling site. [ref by 170(1)]	<input type="checkbox"/>	<input type="checkbox"/>
	070(8)(a)(i)	All required DW counted when making quantity determinations.	<input type="checkbox"/>	<input type="checkbox"/>
	070(8)(b)(i)	SQG wastes on site properly designated.	<input type="checkbox"/>	<input type="checkbox"/>
	070(8)(b)(ii)	SQG exempt from regulation because DW is managed safely and poses no threat to human health or the environment.	<input type="checkbox"/>	<input type="checkbox"/>
	070(8)(b)(iii)	SQG waste either treated or disposed of in an on-site facility, or have ensured delivery to an authorized off-site facility.	<input type="checkbox"/>	<input type="checkbox"/>
	060(5)	If the site has an EPA ID, they submit a DW report annual. [ref by -170(2) -220(1)]	<input type="checkbox"/>	<input type="checkbox"/>

**MQG and LQG Requirements (not required for Conditionally Exempt SQGs)**  
MQG generates 220-2,200 lbs (100-1,000kg; 27-270 gal) per month HW; stores <2,200 lbs (1,000 kg; 270 gal) on site

Record Keeping	060(1)	Site has a valid EPA/State ID Number ( <a href="http://www.ecy.wa.gov/programs/hwtr/waste-report/notification.html">http://www.ecy.wa.gov/programs/hwtr/waste-report/notification.html</a> )	<input type="checkbox"/>	<input type="checkbox"/>
	060(2)	Revised DW Site ID form submitted upon change in company name or mailing address	<input type="checkbox"/>	<input type="checkbox"/>
	060(5)	An Annual DW report has been submitted each year. [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>
	220(1)	An Annual DW report was completed according to instructions. [ref by -170(2) & -060(5)]	<input type="checkbox"/>	<input type="checkbox"/>
	210(2)	Copies of DW Annual Report and/or exception reports and Site ID Form kept on site [ref by -170(2) and -220]	<input type="checkbox"/>	<input type="checkbox"/>
	210(3)	Waste designation records kept for 5 years. [ref by -170(1) & -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>
	180(1)	DW manifests completed properly. [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>
	210(1)	Signed DW manifests kept for 5 years. [ref by 170(2) and -180(3)]	<input type="checkbox"/>	<input type="checkbox"/>
	220(2)	An exception report was filed with Ecology when a signed manifest was not received from the TSD within 45 days, [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>
	140(2)(a)	LDR records kept for each type of hazardous waste manifested off site. [by ref 40 CRR Part 268]	<input type="checkbox"/>	<input type="checkbox"/>
	070(7)(c)	All required DW counted when making quantity determinations.	<input type="checkbox"/>	<input type="checkbox"/>
	170(3)(b)	Treatment by generator logs were kept with dates and the amount of waste treated.	<input type="checkbox"/>	<input type="checkbox"/>
	300(5)	Required Waste Analysis Plan was on site (for compliance with -300(2), (3), (4) and (5)(a-i))	<input type="checkbox"/>	<input type="checkbox"/>

RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

MQG and LQG Requirements (Continued)					
Waste Management	170(1)(a)	Waste streams properly designated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	070(4)	Waste streams designated for state criteria. [ref by 170(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	070(6)	All appropriate DW numbers were used to designate a waste stream. [ref by 170(1)]	<input type="checkbox"/>	<input type="checkbox"/>	
	141(1)	<b>DW shipped to an authorized TSDF for disposal or a facility authorized to receive DW.</b>	<input type="checkbox"/>	<input type="checkbox"/>	
	630(2)	Containers in good condition (not rusted or defective). [ref by 200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	200(1)(d)	DW labeled as "Hazardous Waste" or "Dangerous Waste" and with major risk. [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(3)	Containers labeled with major risk and old labels removed from empty container [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(5)(a)	Containers kept closed unless removing or adding waste. [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(7)	Containers of liquid DW have adequate secondary containment. [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	082(3)	Solid waste contaminated with a DW was managed as DW. [ref by 170(1) & 070(3)(a)(ii)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(6)	DW accumulation areas inspected weekly and inspection log maintained. [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	200(2)(a)	Satellite Accumulation Areas (SAAs) managed correctly. [ref by -170(2)] (a) SAAs do not exceed 55 gal, (b) when full immediately dated (c) good condition, compatible wastes and (d) closed.	<input type="checkbox"/>	<input type="checkbox"/>	
	200(2)(b)	Full SAA waste moved to final accumulation area within three days. [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(8)(b)	Containers holding ignitable or reactive waste stored in accordance with Uniform Fire Code [ref by 00(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	200(1)(c)	Containers of DW were marked with the accumulation start date. [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(4)	Containers not reactive with contents. Contents not reactive when mixed. [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(9)	Incompatible dangerous wastes stored properly separated. [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	630(5)(c)	Minimum aisle space between drums maintained (30"). [ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	Preparedness, Prevention and Training	201(2)(a)	DW disposed of within 180 days of accumulating (MQG only). [ref by -170(3)]	<input type="checkbox"/>	<input type="checkbox"/>
		016(5)(d)(ii)	No Speculative Accumulation: 75% of stored recyclable material within a calendar (Jan 1) year	<input type="checkbox"/>	<input type="checkbox"/>
505(2)(c)		Land Disposal Restrictions (LDR) complied with.	<input type="checkbox"/>	<input type="checkbox"/>	
802		Compliance with the Permit by Rule requirements.	<input type="checkbox"/>	<input type="checkbox"/>	
340(2)		Communication devices/alarms provided during dangerous waste handling. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
340(1)		Emergency equipment provided/maintained in dangerous waste accumulation areas. [ref by 200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
201(2)(c)(ii)		Posted by telephone: Emergency Coordinator's name and phone number, Fire Dept. phone number, locations of fire extinguishers, spill control materials and any fire alarm equipment (MQG only). [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>	
201(2)(c)(i)		Designated emergency coordinator who responds to any emergency, coordinates facility response and makes notifications if emergency threatens health or environment off site. [ref by -170(2)]	<input type="checkbox"/>	<input type="checkbox"/>	
320(1)		General facility inspections conducted. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
320(2)		General facility inspection schedule was developed and followed. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
Recycling	320(2)(b)	General facility inspection schedule identifies types of problems to look for. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
	320(2)(c)	The frequency of inspection specified in the schedule. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
	320(2)(d)	The inspection log or summary kept for five years after the inspection [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
	340(4)	Arrangements with local authorities for emergency assistance and response were made and documented.[ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>	
	120	Recycling requirements met by facility.	<input type="checkbox"/>	<input type="checkbox"/>	
Spill	525(1)(b)(ii)	Regulated quantities of precious metal containing waste manifested off site.	<input type="checkbox"/>	<input type="checkbox"/>	
	505(2)(a)	Recyclable materials not managed in a way that is "use constituting disposal" without complying with sections -170 through -230.	<input type="checkbox"/>	<input type="checkbox"/>	
	505(2)(c)	LDR applied when DW is used in a manner constituting disposal.	<input type="checkbox"/>	<input type="checkbox"/>	
DW Tanks	525(1)(b)(ii)	Precious metals managed in compliance with generator manifesting requirements of -180.	<input type="checkbox"/>	<input type="checkbox"/>	
	145(2)	A spill to the environment was reported to Ecology immediately	<input type="checkbox"/>	<input type="checkbox"/>	
	145(3)	A spill or discharge of DW or hazardous materials was appropriately mitigated or controlled.	<input type="checkbox"/>	<input type="checkbox"/>	
Add	640(6)	Daily inspections of tanks performed (b) and log kept (d).	<input type="checkbox"/>	<input type="checkbox"/>	
	640(5)(d)	Tanks adequately labeled with major risk and visible from 50 feet. [as ref by -200(1)(b)]	<input type="checkbox"/>	<input type="checkbox"/>	
	640(4)(c)(iv)	Secondary containment free of leaked waste and precipitation (leaked waste or precipitation removed in 24 hours).	<input type="checkbox"/>	<input type="checkbox"/>	
			<input type="checkbox"/>	<input type="checkbox"/>	

Is Facility an LQG of DW (generates >1,000 kg/270 gallons/2,200 lbs/month)?  N  Y If Yes, complete LQG Checklist.



RCRA Site ID # WAH000036544	Facility name Stericycle Inc Morton	Inspection date June 1, 2010
Generator status Medium	Facility address 830 Westlake Ave, Morton WA 98356	Date Report Sent July 6, 2010

<b>LQG Requirements</b> Generates > 2,200 lbs (1,000 kg/270 gals) per month of HW or stores over 2,200 lbs (1,000 kg; 270 gal) on site & >2.2 lbs (1 kg) per month of EHW				
WAC Code 173-303-		Facility status is evaluated for each item on this Checklist as follows: V=Violation Noted (Yes/No) PV=Previous Violation (from previous inspection)	Facility Status	
			V	PV
Accumulation Time Limit	200(1)	DW accumulated on site for not more than 90 days. [ref by -170(3)]	<input type="checkbox"/>	<input type="checkbox"/>
Training Requirements	330	The training requirements were met (training program, written plan, training records) [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>
	330(1)	A program of classroom or on-the-job training provided. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>
	330(2)	A DW training plan was adequate and available. [ref by -200(1)(e)] Was the plan thoroughly reviewed as part of this inspection? Yes <input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	330(2)	A written personnel training plan was prepared and maintained. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>
	330(3)	Personnel training records were adequately maintained. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>
Planning	350(2)	A contingency plan was prepared. [ref by -200(1)(e)]	<input type="checkbox"/>	<input type="checkbox"/>
	350(3)	Contingency plan was adequate, maintained and available. [ref by -200(1)(e)] Was the plan thoroughly reviewed as part of this inspection? Yes <input type="checkbox"/> No <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Add				