



WASHINGTON REFUSE & RECYCLING ASSOCIATION

February 2, 2006

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket No. TG-990161

Dear Ms. Washburn:

On behalf of Washington Refuse and Recycling Association, I can assure you we are in support of the language contained in Docket TG-990161. As we have indicated in the past, our Association supports the enforcement policies of the WUTC, and in particular those which provide for swift and simplified procedures, as does this docket.

In addition, I have enclosed a WRRA work plan on enforcement related issues during 2006, in preparation for the 2007 Legislative Session and funding for the 2007-09 Biennium. Please review and I will follow up with a phone call to answer any questions you might have.

Sincerely,

Brad Lovaas
Executive Director

WRRRA Solid Waste/Commercial Recycling Enforcement Initiative 2006

Implement the Recycling Enforcement and Accountability Law (REAL) that went into effect in July 2005.

Facilitate partnerships between state and local agencies with jurisdiction over the hauling the solid waste and the facilities that receive solid waste, and those same/different agencies that have jurisdiction of the hauling of recyclable and recycling facilities.

Facilitate DOE and WUTC understanding that they both have roles and responsibilities in same area – the lawful handling of solid waste and commercial recyclables.

Washington State Department of Ecology (DOE): Solid Waste Handling Facilities, Recycling Facilities and Transporters of Commercial Recyclables.

Washington State Utilities and Transportation Commission (UTC): Solid Waste & Residential Recycling Hauling.

Counties Solid Waste Divisions: Adoption of local ordinances dealing with commercial recycling and enforcement.

Local Health Departments: Delegated local agent for DOE.

Department of Ecology

- Implementation of SB 5788 Transporter Registration and Facility Notification as of January 1, 2006
- Adopt WAC Rule setting up administrative procedures and remedies by September 2006.
- Coordinate with WUTC on implementation of SB 5788 and on-going enforcement program for illegal commercial recycling.
- Determine whether or not additional legislation is needed in 2007 to deal with fee and other issues.
- Determine fee level to support program.
- Prepare a budget request for 2007-09 Biennial Budget that supports enforcement program for both proactive and reactive enforcement (education, investigation, compliance monitoring and enforcement actions)

Utilities and Transportation Commission

- Coordinate with DOE on implementation of 5788 and on-going enforcement of illegal commercial recycling activities
- Assess current enforcement program for solid waste and recycling.
- Determine fee level (currently .4 of 1% of regulated revenues) to support both a proactive and reactive enforcement program. If determined, seek commission and legislative approval of enhanced program.