

EXHIBIT RM-06
DOCKET: TG-200083
RIDWELL INC. CARRIER CLASSIFICATION
WITNESS: RYAN METZGER

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF DETERMINING THE
PROPER CARRIER CLASSIFICATION OF:

No. TG-200083

RIDWELL, INC.

SIXTH EXHIBIT TO THE DIRECT TESTIMONY OF RYAN METZGER
Common Carrier, Solid Waste Collection Company, and Private Carrier
ON BEHALF OF RIDWELL, INC.

May 5, 2020

Common Carrier, Solid Waste Collection Company, and Private Carrier - June 2011

	Common Carrier	Solid Waste Collection Company	Private Carrier
Definitions	<p>WAC 480-14-040 defines common carrier:</p> <p>The term "common carrier" means any person who undertakes to transport property, including general commodities, materials transported by armored car service, and/or hazardous materials, for the general public by motor vehicle for compensation The term does not include ... solid waste collection companies, as defined by WAC 480-70-041 ...</p>	<p>WAC 480-70-041 defines solid waste collection:</p> <p>The "Business of transporting solid waste for collection and/or disposal for compensation" means those carriers who are primarily in the specialized business of solid waste for collection and/or disposal.</p> <p>"Solid waste" ... means all putrescible and nonputrescible solid and semisolid wastes including, but not limited to:</p> <ul style="list-style-type: none"> • Garbage • Rubbish • Refuse • Swill • Ashes • Industrial wastes • Sewage sludge • Demolition and construction wastes • Abandoned vehicles or parts of abandoned vehicles • Source-separated recyclable materials collected from single and multifamily residences. <p>"Solid waste collection" means collecting solid waste from residential or commercial customers and transporting the solid waste, using a motor vehicle, for collection and/or disposal over the highways of the state of Washington for compensation.</p>	<p>RCW 81.77.010(5) defines a private carrier:</p> <p>"Private carrier" means a person who, in his or her own vehicle, transports solid waste purely as an incidental adjunct to some other established private business owned or operated by the person in good faith. A person who transports solid waste from residential sources in a vehicle designed or used primarily for the transport of solid waste is not a private carrier.</p>
Policy Memo: Solid Waste Company		Solid Waste Collection – Regulated: A solid waste collection company provides regularly scheduled solid waste collection service to	

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		residential, commercial, and industrial customers in a defined territory. For residential service, the customer typically places the material (garbage, recycling or yard waste) in a container and places the container at the curb on a predetermined schedule for pickup.	
Policy Memo: Advertising		RCW 81.77.090 - Operating for the hauling of solid waste for compensation includes advertising, soliciting, offering or entering into an agreement to provide that service.	A clean-up company without a solid waste permit may advertise as a "junk hauler" <u>and</u> "clean-up" or "site restoration" service. It may not advertise as purely a junk hauler.
Policy Memo: Cleanup Services			<p>Cleanup Services: A cleanup service physically removes materials from a residential or commercial customer's business location, home, garage, shed, yard, etc., but not from the curb. (For example, 1-800-GOT-JUNK). This service is not a regularly scheduled service. A clean-up service includes company personnel exiting the vehicle to pick up materials not at the curbside. For example, if a person picks up a large bunch of tree branches from the yard, it is not solid waste collection. If a person removes a refrigerator from a garage, it is not solid waste collection. The employees of a clean-up service may load loose material into a container or directly into the company's truck to remove from the customer's property. The customer may not load the materials into containers or the vehicle, nor set the materials out at the curb for pickup. The materials may be recycled, reused, sold, or otherwise disposed of.</p> <p>A private carrier is not required to have a solid waste certificate or a common carrier permit.</p>

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Policy Memo: Drop Boxes and Commercial Containers	A company hauling commercial recycling in a drop box must have a common carrier permit.	A company that delivers a container at a customer's location, has the customer fill the container with solid waste, and then hauls the container to a material recovery center or disposal site must have a solid waste certificate.	Drop boxes at a residence filled by a clean-up or site restoration company as an incidental part of its established business are not regulated.
Policy Memo: Charitable Donations	If a company picks up and takes materials to a charitable organization, such as Goodwill, the haul is not a solid waste haul as long as the materials were not picked up at the curb. Any company with a common carrier permit may haul materials from a commercial establishment to a charitable organization.	If charitable donations are collected at the curbside, only a company with a solid waste certificate may haul them from a residence.	Reusable materials, not at the curbside, may be collected by a clean-up or site restoration company as an incidental part of its established business - not regulated.
Policy Memo: Recycling	Commercial recycling requires a common carrier permit. Any company with a common carrier permit may haul materials from a commercial establishment to a recycling facility.	Residential yard waste recycling is regulated. Only a company with a solid waste certificate may haul recycling from a residence if the recyclable materials are collected at the curbside.	Recyclable materials, not at the curbside, may be collected by a clean-up or site restoration company as an incidental part of its established business - not regulated.
Policy Memo: Residential Yard Waste		If a company hauls yard waste to a recycler, it is recycling and not solid waste hauling. Only a company with a solid waste certificate may haul recycling from a residence if the recyclable materials are collected at the curbside.	Yard waste materials, not at the curbside, may be collected by a clean-up or site restoration company as an incidental part of its established business - not regulated.
TG 072226: Industrial Waste Stabilizer		Commission Order 06 in TG-072226, paragraph 48: Respondent Companies are not transporting recyclable materials to Weyerhaeuser's MRF in Cowlitz County. Further, Weyerhaeuser's mixing of these CDL wastes with their own industrial wastes under the permitting requirements for its	

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		landfill does not constitute recycling under any legal definition. Therefore, Respondent Companies are transporting solid waste when they deliver mixed CDL materials to the Weyerhaeuser MRF.	