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WILLIAM K. RASMUSSEN

(206) 628-7760

October 20, 1994

VIA FAX -- (206-586-1150) and U.S. Mail

Mr. Steve McLellan, Secretary
Washington Utilities and
Transportation Commission
1300 Evergreen Park Drive South
P.O. Box 9022
Olympia, WA 98504-9022

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STATE OF WASHINGTON
UTIL. & TRANSPORTATION
COMMISSION

Re: The Disposal Group v. Waste Management Disposal Services of Oregon d/b/a Oregon Waste Systems, Washington Utilities and Transportation Commission
Docket No. TG-941154

Dear Mr. McLellan:

Enclosed for filing is the original and three copies of respondent Waste Management's List of Primary Witnesses and Exhibits in connection with the above-referenced matter.

Thank you for your assistance in this matter.

Very truly yours,

DAVIS WRIGHT TREMAINE



William K. Rasmussen

Enclosure

cc: Parties of Record
Mr. John Prusia, Hearing Officer
Mr. William Jeffry
Mr. Norman Wietting
Mr. Douglas Coenen

25608\50\00043.LTR
Seattle

Fax: (206) 628-7040

ANCHORAGE, ALASKA · BELLEVUE, WASHINGTON · BOISE, IDAHO · LOS ANGELES, CALIFORNIA
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STATE OF WASH.
UTIL. & TRANSP
COMMISSION

BEFORE THE UTILITIES AND TRANSPORTATION COMMISSION
OF THE STATE OF WASHINGTON

THE DISPOSAL GROUP, INC., dba
VANCOUVER SANITARY SERVICE and
TWIN CITY SANITARY SERVICE, a
WASHINGTON CORPORATION (G-65);

Complainant,

vs.

WASTE MANAGEMENT DISPOSAL
SERVICES OF OREGON, INC., dba
OREGON WASTE SYSTEMS, a
DELAWARE CORPORATION; and T&G
TRUCKING & FREIGHT CO., an Oregon
Corporation,

Respondents.

NO. TG-941154

WASTE MANAGEMENT'S
LIST OF PRIMARY
WITNESSES AND EXHIBITS

Respondent, Waste Management Disposal Services of Oregon, Inc., d/b/a Oregon Waste Systems ("OWS") identifies the following primary witnesses and exhibits for the Brief Adjudicative Proceeding in connection with the above-captioned matter:

A. Primary Witnesses

1. Norman Wietting -- Oregon Waste Systems
2. Chris Zepernick -- Rust Remedial Services
3. Dennis Cearnes -- SCS Engineers

WASTE MANAGEMENT'S PRIMARY
WITNESSES AND EXHIBITS - 1

25608\50\00040.EXH
Seattle

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SEATTLE, WASHINGTON 98101-1688
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1 **B. Exhibits**

- 2 1. Letter dated April 28, 1994 from Hart Crowser to
3 Aluminum Company of America regarding results of
4 sludge pond sampling and analysis. [Included as
5 part of the WUTC staff report; copy not provided
6 here.]
- 7 2. Letter dated August 22, 1994 from OWS to the
8 Disposal Group. [Included as part of the WUTC
9 staff report; copy not provided here.]
- 10 3. Letter dated August 22, 1994 from OWS to Oregon
11 DEQ regarding use of sludge material as
12 alternative daily cover. [Included as part of the
13 WUTC staff report; copy not provided here.]
- 14 4. Letter dated August 26, 1994 from Oregon DEQ to
15 OWS authorizing evaluation and use of sludge
16 material as alternative daily cover. [Provided to
17 parties on October 14, 1994; copy not provided
18 here.]
- 19 5. Letter dated June 13, 1994 from Finley Buttes
20 Landfill Company to RUST Remedial Services. [See
21 attached copy.]
- 22 6. Two bills of lading dated August 23 and August 24,
23 1994 [See attached copies].
- 24 7. Two bills of lading dated September 6, 1994.
25 [Included as part of the WUTC staff report; copies
not provided here.]
- 26 8. Declaration of Norman Wietting. [To be served
Friday, October 21, 1994; copy not provided here].
- 27 9. Declaration of Chris Zepernick. [To be served
Friday, October 21, 1994; copy not provided here].

28 Waste Management understands that the parties have agreed
29 that the Commission will take judicial notice of the entire Clark
30 County Solid Waste Comprehensive Plan (April 1994) and that it
31 may be referenced by any party in these proceedings.

32 Waste Management reserves the right to call any other
33 witness or offer any other exhibit for purposes of rebuttal.

34 **WASTE MANAGEMENT'S PRIMARY**
35 **WITNESSES AND EXHIBITS - 2**
25608\50\00040.EXH
Seattle

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Dated this 20th day of October, 1994.

DAVIS WRIGHT TREMAINE
Attorneys for Waste Management
Disposal Services of Oregon, Inc.,
d/b/a Oregon Waste Systems



William K. Rasmussen
WSBA #20029

WASTE MANAGEMENT'S PRIMARY
WITNESSES AND EXHIBITS - 3
25608\50\00040.EXH
Seattle

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding by faxing the same to:

Steve McClellan, Secretary
Washington Utilities and Transportation Commission
1300 Evergreen Park Drive South
P.O. Box. 9022
Olympia, WA 98504-9022
(206) 586-1150 (fax)

John Prusia, Hearing Officer
Washington Utilities and Transportation Commission
1300 Evergreen Park Drive South
P.O. Box. 9022
Olympia, WA 98504-9022
(206) 586-1150 (fax)

Cynthia A. Horenstein
Horenstein & Duggan
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900 Washington Street, Suite 900
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Vancouver, WA 98666
Attorney for The Disposal Group, Inc.
(206) 694-9086 (fax)

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Attorney for T&G Trucking & Freight Co.
(206) 464-9594 (fax)

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Assitant Attorney General
Heritage Plaza Building
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Olympia, WA 98504-1028
(206) 586-5522 (Fax)

James K. Sells
McCluskey, Sells, Ryan, Uptegraft & Decker
510 Washington Ave, Suite 300,
Bremerton, WA 98337

WASTE MANAGEMENT'S PRIMARY
WITNESSES AND EXHIBITS - 4
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Seattle

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Attorney for Washington Refuse & Recycling Association
(206) 377-4581 (fax)

Dated this 20th day of October, 1994 at Seattle,
Washington.



Christine Lewis

WASTE MANAGEMENT'S PRIMARY
WITNESSES AND EXHIBITS - 5
25608\50\00040.EXH
Seattle

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P.O. BOX 61726
VANCOUVER, WA 98666
503/288-7844
206/895-4859
FAX 206/895-5091

June 13, 1994

By Fax

Mr. Frank Willman
RUST Remedial Services, Inc.
1120 Andover Park East
Tukwila, WA 98188

Dear Frank:

I am pleased to confirm our conversation today about transportation and disposal prices for the ALCOA Wastewater Sludge Impoundment closure.

Finley Buttes Landfill Company, in conjunction with Tidewater Barge Lines, is pleased to provide transportation and disposal services for \$34.00 per ton. Our price does not include Washington State collection and refuse tax of 4.6%. FBLC commitment to RUST is based on our handling of 30 - 40 containers per day, six days a week. We assume the work will begin in the fall of 1994 and not extend into 1995 or 1996.

The waste will be transported in open-end boxes, each carrying a payload of 29 tons. It will be RUST Remedial Services' responsibility to provide a conveyor to load the boxes up to the maximum legal limit.

I hope our services and infrastructure adjacent to the cleanup site are acceptable for you to secure this work. We are pleased to join forces with you and will work to promote a long-term relationship.

Sincerely,

Dean Large
Sales Manager

DL/nw

FROM : Panasonic IHD/FRX

PHONE NO. :

Sep. 19 1994 02:37PM F3

064



Oregon Waste Systems, Inc.
Columbia Ridge Landfill & Recycling Center
18177 Cedar Springs Lane
Arlington, OR 97012

BILL OF LADING

Date: 8/23/94

| | |
|---|---|
| <p>Generator's Name & Address ALCOA 6309 Lower River Rd. Wagoner, WA 99660</p> <p>Generator's Contact Person K. P. [unclear]</p> <p>Generator's Telephone Number 509-676-4181</p> | <p>Waste Profile # 199962 199962</p> |
| <p>Transporter Name BUS/TAG 224</p> | <p>Container # W11X4 400183 NET WT. 2810T</p> |

Disposal Facility
COLUMBIA RIDGE LANDFILL & RECYCLING FACILITY
18177 CEDAR SPRINGS LANE
ARLINGTON, OREGON 97012 TELEPHONE # (503) 454-2030

Special Handling Instructions
TO BE RECYCLED AS DAILY COVER AT
COLUMBIA RIDGE LANDFILL & RECYCLING CENTER

Richard D. Danisco
Generator's Signature

8-23-94
Date

098 E99



Oregon Waste Systems, Inc.
Columbia Ridge Landfill & Recycling Center
18177 Cedar Springs Lane
Arlington, OR 97812

BILL OF LADING

Date: 8/24/94

| | |
|---|-------------------------------------|
| <p>Generator's Name & Address ALCOA 4309 Lower River Rd. WASCO, WA. 98660</p> <p>Generator's Contact Person R. Dinius</p> <p>Generator's Telephone Number 206-1096-2181</p> | <p>Waste Profile # 199962</p> |
| <p>Transporter Name OWS/T&G 223</p> | <p>Container # EG70470462-0</p> |
| <p>Disposal Facility COLUMBIA RIDGE LANDFILL & RECYCLING FACILITY 18177 CEDAR SPRINGS LANE ARLINGTON, OREGON 97812 TELEPHONE # (503) 454-2030</p> | |
| <p>Special Handling Instructions TO BE RECYCLED AS DAILY COVER AT COLUMBIA RIDGE LANDFILL & RECYCLING CENTER</p> | |
| <p><i>Richard Dinius</i> Generator's Signature</p> | <p>8/24/94 Date</p> |