

Attachment A

Applicable Laws and Rules

RCW 80.04.405 allows the commission to assess an administrative penalty for any violation by a regulated company of a statute, rule, the company's own tariff, or commission order.

RCW 81.04.510 Duties of attorney general. It shall be the duty of the attorney general to represent and appear for the people of the state of Washington and the Commission in all actions and proceedings involving any question under this title, or under or in reference to any act or order of the Commission; and it shall be the duty of the attorney general generally to see that all laws affecting any of the persons or corporations herein enumerated are complied with, and that all laws, the enforcement of which devolves upon the Commission, are enforced, and to that end he or she is authorized to institute, prosecute, and defend all necessary actions and proceedings.

RCW 81.01.010 Adoption of provisions of chapter 80.01 RCW. The provisions of chapter 80.01 RCW, as now or hereafter amended, apply to Title 81 RCW as fully as though they were set forth herein.

RCW 81.04.380 allows the commission to assess a penalty not to exceed \$1,000 for each violation following a hearing.

Docket A-120061 - Enforcement Policy of the Washington Utilities and Transportation Commission – Section V.

Attachment B

Washington State Department of Revenue

[Services](#) [Business Lookup](#) [RIDWELL INC.](#)

License Information:

[New search](#) [Back to results](#)

Entity name: RIDWELL, INC.
Business name: RIDWELL INC.
Entity type: [Profit Corporation](#)
UBI #: 604-331-559
Business ID: 001
Location ID: 0001
Location: Active
Location address: 956 N 42ND ST
 UNIT A
 SEATTLE WA 98103-7317 USA
Mailing address: 956 N 42ND ST
 UNIT A
 SEATTLE WA 98103-7317 USA

Excise tax and reseller permit status: [Click Here](#)

Secretary of State status: [Click here](#)

Governing People *May include governing people not registered with Secretary of State*

Governing people	Title
MARDER, ALIYA	Secretary
METZGER, RYAN	President

Registered Trade Names

Registered trade names	Status	First issued
RIDWELL INC.	Active	Apr-12-2019

The Business Lookup information is updated nightly. Search date and time: 4/23/2019 11:32:37 AM

Attachment C

Corporations and Charities Filing System

Business Information

BUSINESS INFORMATION

Business Name: RIDWELL, INC. UBI Number: 604.331.559
 Business Type: FOREIGN PROFIT CORPORATION Business Status: ACTIVE
 Principal Office Street Address: 312 W REPUBLICAN ST # A, SEATTLE, WA, 98119-4005, UNITED STATES Principal Office Mailing Address: PO BOX 19732, SEATTLE, WA, 98109-6232, UNITED STATES
 Expiration Date: 05/30/2020 Jurisdiction: UNITED STATES, DELAWARE
 Formation/Registration Date: 05/13/2018 Period of Duration: PERPETUAL
 Inactive Date:
 Nature of Business: OTHER SERVICES

REGISTERED AGENT INFORMATION

Registered Agent Name: FAIRCIELD RECORD SEARCH LTD.
 Street Address: 3400 CAPITOL BLVD SE, TUMWATER, WA, 98561, UNITED STATES Mailing Address: PO BOX 1366, OLYMPIA, WA, 98507-1366, UNITED STATES

GOVERNORS

Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		ALIYA	MARDER
GOVERNOR	INDIVIDUAL		JUSTIN	GOUGH
GOVERNOR	INDIVIDUAL		RYAN	METZGER
GOVERNOR	INDIVIDUAL		DAVID	DARSON

[Back](#) [Filing History](#) [Name History](#) [Print](#) [Return to Business Search](#)



Do good by wasting less

We make it easy to sustainably reuse
and recycle your stuff.

GET STARTED

Meet your fourth bin

You care about where your stuff goes. So do
we.

Our used stuff still has value but it too often
ends up in landfills or contaminating our
recycling.

But you might not have time to figure out the

<https://www.getridwell.com>

1/13

best way to get rid of your stuff or time to drop it off.

Starting at \$10 per month, we pick up your stuff and make sure it is either locally reused or sustainably recycled. We commit to being the best way to get rid of your stuff.



We can make a difference

Every year, Americans throw away millions of tons of
recycleable materials

99
BILLION
plastic bags

26
BILLION
pounds of reusable clothes

999
MILLION
pounds of styrofoam

How it works





Use your Ridwell bags around the house

We provide you with bags to store your **batteries, light bulbs, plastic film, and threads.** These are your core categories and can be picked up every two weeks.

Keep them in your laundry room, kitchen pantry, or wherever is best for you. That's delightful decluttering.





Opt-in for bi-weekly pickups of our 5 categories

There are five categories we take every pickup: the four core categories plus the [rotating fifth category](#).

If any of your bags are full or you have something from the rotating category, opt-in to your pickup and put it in your Ridwell bin!





We pick it all up from your porch

The bin is weather-proof and we won't take anything by mistake!

On your Ridwell pickup day, we'll come by to empty your bin and leave your bags in your bin. Your stuff will go to sustainable recyclers or local reuse partners.





We bring it to a better place

Rest assured that your stuff is being given a new life and stays out of the landfill.

We thoroughly vet and only partner with local organizations that are committed to reuse and sustainability.

Want to make a difference for the planet *and* your trash bill?

Find out about plastic film and how it can be recycled through Ridwell!



Your weekly special

Every pickup, we help you delightfully declutter your home.

The rotating fifth category changes every pickup and is inspired by customer demand—like latex paint—or local need—like winter coats.

We find special partners for less common or particularly hard-to-recycle items that can go to a better place.

Support women's independence

Bra collection for Free the Girls

The motherboard connection

Electronics pickup and recycling

Save the sweet tooth

Halloween candy drive for Birthday Dreams

Give back to the library

Book drive for the Friends of SPL

<p>Paint the town Latex paint recycling</p>	<p>Pass the glasses Eyeglasses drive with Lions NW</p>
<p>Put a cork in it Cork recycling with Cork Forest</p>	<p>No more cavities! Oral care product recycling</p>

How we are solving Styrofoam

For Ridwell members, we offer Styrofoam add-ons to any pickup. No more guilt, no more headache.

[LEARN MORE](#)

How we stack up



<https://www.getridwell.com>

9/13



Guilt-free convenience

We pick up from your porch, so you don't have to remember yet another thing. And you don't even have to be there.

Sustainable uses for your stuff

We bring your items to places where they will have grateful owners or another life as something new. Baby clothes meet a new baby. Styrofoam becomes picture frames.

Value-driven community

Get connected to companies and products that put sustainability above profit. Meet others in your community. Make your neighborhood a better place to live.

Starting at

\$10 per month

[SEE PLANS](#)

Our story

Our story began with a father and son trying to do the right thing with dead batteries and seeing how hard it was.

This turned into Owen's List, a large community of people in Seattle sharing new ideas and making a difference one pickup at a time.

**From your door to local partners,
get rid of things the right way.**

GET STARTED

Queen Anne & Magnolia
news

My Ballard



How it works

Styrofoam

What we take

Giftng

Pricing

FAQ

About us

Questions? Let's chat, we're pretty nice!

help@getridwell.com

Interested in working with us?

careers@getridwell.com

Want to become a Ridwell partner?

partners@getridwell.com

Attachment E

Confirmation for Friday's Ridwell Plastic Film Pickup! Inbox x



notifications@typeform.com

to me

Thanks for participating in our plastic film recycling event!

Here's what will happen from here:

1. Make sure your plastic film is in a visible place at 10935 NE 133rd St, Kirkland, WA 98034 by Friday
2. We will send a text to +13608101281 once we have your stuff (or if we have any trouble)

That's it! Need to contact us? You can reply to this email.

Happy Recycling,
The Ridwell Team

P.S. You're close to having the full Ridwell experience to your area! You can help bring us back soon by

kirkland.ridwell.com
yzyc2mk61z0t4aniwyzyc6q6620879g

Typeform sent you this email on behalf of a typeform creator. We aren't responsible for its content. If you

[Unsubscribe from all Typeform respondent notifications](#)

2

No
cl
Star
c



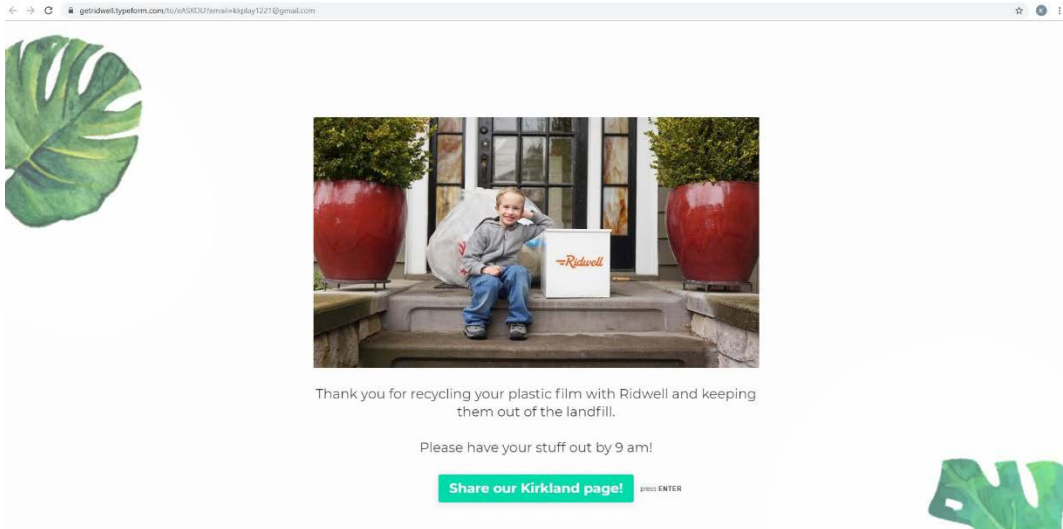
Kelley Jurgensen <kkplay1221@gmail.com>

to Ryan

please cancel. I will not be able to prepare my stuff in time.

thanks. kelley

Attachment F



GET STARTED

Hooray!

We pick up from your neighborhood every two weeks on Mondays!

Create your profile

We will come to your house to pick up your Ridwell stuff. We'll also send you reminders of your pickup and let you know about any specials we have in store.

First name	_____	Last name	_____
	Jenny		
Home Address	_____		
	6228 84th Ave SE		
City	_____	Zip	_____
	Mercer Island		98040
Mobile Number	_____		
Email Address	_____		
	dearjennyplease@gmail.com		

Yes! I want to hear about the impact I'm having and find out about new features and categories!

I agree to Ridwell's [Terms and Conditions](#), which we make as human readable as possible :)

Attachment G

PUBLIC HEALTH - SEATTLE & KING COUNTY Downtown Office 401 - 5th Ave., Ste 1100 Seattle, WA 98104 206-263-9566	PURPOSE OF VISIT: Routine Inspection/Field Review of a Material recovery and recycling facilities establishment (PE=1026)
ESTABLISHMENT INFORMATION: 312 W REPUBLICAN ST, UNIT A, SEATTLE 98119 SEATTLE, WA 98119 Service Request #: SR1429680	INSPECTION INFORMATION: Date of Inspection: Tuesday, October 8, 2019 Time In: 9:50 am Time Out: 11:45 am Inspector: Rory O'Rourke Result: COMPLETE Action: Not Applicable

VIOLATIONS OBSERVED (if any)
OVERALL INSPECTION COMMENTS:

Met with Ryan Metzger, CEO; Aliya Marder, Product Manager; and Justin Gough, Operations and Logistics Manager.
 Weather: Partly cloudy with showers, low 50s

Facility is located at 312 W. Republican Street, Suite A, Seattle, WA. Ridwell operates based on subscribers who want to pay to have specific categories of recyclables and household hazardous waste collected and recycled that are not available for curbside collection.

Observations:
 Facility operations are conducted entirely indoors.

The facility is 3755 square feet and holds 10,000 lbs. of material maximum. There are 11-foot ceilings. There is a fire alarm, but no sprinkler or pull lever for fire. Ridwell has applied to operate as a recycling and material recovery facility – exempt, and a mobile collection system. Public access is controlled by garage door on the south side of the facility that is closed when not receiving customers or pickups from recyclers. There is a door in the alleyway facing west that is dead-bolted. There is no parking lot for the facility.

Ryan Metzger indicated that he contacted David Graves, Senior Land Use Planner, Seattle Department of Construction and Inspections, who indicated that Ridwell's use of the facility was acceptable for the zoning designation. David Graves confirmed this via e-mail on November 6, 2019.

No signs were observed for the facility. Pickups from material recovery facilities and deliveries from employee vehicles are from 9 am to 5 pm daily.

All weather roads surround the facility as this is in an urban neighborhood (Queen Anne in Seattle).

Batteries, light bulbs, Styrofoam, textiles, latex paint, plastic film, kitchenware, and electronics have been accepted as waste streams through Ridwell. Waste categories are usually determined two to three months in advance of offering their services to customers. Ridwell employees deliver linen bags to subscribers to deposit their waste items. Linen bags are labeled by waste category, except Styrofoam, which is given an orange plastic bag. Bagged items are placed in white metal containers with a lid. Latex paint is usually set next to the Ridwell container. Any paints that are oil-based, with label missing, or not in the original container are not collected by Ridwell employees. Ridwell

employees will leave a message saying how many items were collected and send information on household hazardous waste facilities.

Although Ridwell has offered collection of wine corks and latex paint, no items from these categories were observed at the time of inspection.

Materials are collected from subscribing households by removing linen bags from Ridwell-supplied metal containers. Linen bags are taken in employees' personal vehicles to be transported to the Ridwell facility.

Materials are screened out by hand. Hard plastics and garbage are removed and disposed of. Subscribers receive comments from Ridwell employees on how well they categorized their waste stream. Light bulbs are removed from linen bags and packed into cardboard boxes which are sealed with tape.

Less than one percent by weight of incidental and accident residual is accepted. There are about 2 bags of garbage per week for the facility, including the office. 9,300 lbs of waste accepted in September and there was 60 pounds of garbage generated. There are no continual piles maintained due to space. All piles cleared out completely due to the space available. Light bulbs and batteries are stored onsite a maximum of 2-4 weeks. Incoming and outgoing wastes are tracked on Google Docs. Buckets with material are weighed at the end of each week. Clothing is weighed on the way in and assumes 30 lbs. per bag.

Training for staff is described for handling light bulbs and batteries. There is a laminated sheet on wall about handling bulb breakage. Any corroded batteries are left in Ziplock bags. Staff are directed not to wear sandals, open-toed shoes, or heels. Employees are shadowed until they feel comfortable.

Waste Category Acceptance

Plastic film and Styrofoam (except food-soiled) – StyroRecycle who picks up material from facility
Batteries – All Battery
Light Bulbs – EcoLights
Threads – Goodwill
Paint- Green Sheen
Electronics- 1GreenPlanet

Actions Required

Ridwell must meet the terms and conditions for exemption as listed under the Washington Administrative Code (WAC) 173-350-210 for the following reasons:

1. Ridwell must coordinate with Kathryn McPherson at Washington Utilities and Trade Commission to ensure compliance with that agency's requirements. Compliance with this agency's standards is required for compliance with WAC 173-350-040, "Performance standards."
2. Ridwell should consult the Seattle Fire Department in order to determine if their facility has appropriate fire protection systems in place in order to be in compliance with WAC 173-350-040, "Performance standards." Public Health would like to receive a signed report of their findings. Ridwell needs to coordinate monthly inspections of fire extinguishers.
3. Before accepting new waste streams, Public Health requires 30 days' notice prior to implementation.

Failure to address these actions above by December 31, 2019, will limit your business to only non-solid waste items according to WAC 173-350-021 and may result in enforcement with civil penalties.

Recommendations

For all waste streams, develop best management practices to ensure effective rodent and insect control.

As a best management practice, have a dust pan, broom, and shovel in vehicles to facilitate cleanup of items if spills or breakage occurs.

Light bulbs should be placed in cardboard containers during collection to mitigate breakage and exposure to mercury vapors from CFL bulbs. Contact the King County Hazardous Waste Management Program at 206-296-4692 or visit <https://guiltfreekc.org/business/> to schedule a free business consultation for best management practices for handling CFL bulbs.

Update flyers and messaging through the Ridwell app that customers should only place clean pre-consumer Styrofoam takeout containers. Ridwell should screen for any Styrofoam takeout containers contaminated with food as employees pick up Styrofoam.

Person in Charge Name:

Justin Gough

Email: justin@getridwell.com

PIC Phone #: 206-612-7026



Rory O'Rourke
Health and Environmental Investigator III

The following items are evaluated during inspections.
 Violations cited as out of compliance during this inspection are highlighted below.
 Out=out of compliance

OUT

Closure Plan

- 0437 - Closure plan followed if closing

Design Standards

- 0400 - Public access must be controlled (Physical barriers to prevent unauthorized public access)
- 0401 - Facility structures must be sturdy and easily cleanable
- 0402 - Must provide effective means to control rodents, insects, birds or vectors
- 0403 - Facility designed to control litter. (Netting, fencing, etc.)
- 0404 - Must provide protection of the tipping floor from wind, rain or snow
- 0405 - Must provide pollution control measures for surface and ground water
- 0406 - Must provide pollution control measures to protect air quality
- 0407 - All weather surfaces must be provided for vehicle traffic
- 0417 - Must be operated in a manner to protect human health and environment
- 0418 - Must prohibit disposal of dangerous waste or unacceptable waste. (screening or monitoring)

Exempt MRF Facilities

- 0439 - Exempt MRF facilities must meet performance standards of WAC 173-350-040.
- 0440 - Only source separated materials accepted and residual wastes must not exceed limits
- 0441 - Must allow inspections
- 0442 - Exempt MRF facility must notify the department 30 days prior to opening.
- 0443 - Annual reports must be current

Ground Water Monitoring

- 0436 - Methods in place for ground water monitoring

Operation Standards

- 0419 - Rodents, insects and vectors must be controlled (standing water, rodent and bird control)
- 0420 - Litter must be controlled
- 0421 - Scavenging must be prohibited
- 0422 - Open burning must be prohibited
- 0423 - The facility must be operated to control dust
- 0424 - Must control nuisance odors for putrescible waste
- 0425 - Must provide attendants during operating hours
- 0426 - Must have sign posted with facility name, hours open to the public, and unacceptable materi
- 0427 - Emergency communications must be available and maintained
- 0428 - Weekly inspections must be conducted and noted deficiencies corrected
- 0429 - Records must be kept for incoming and outgoing wastes
- 0430 - Annual report due April 1st
- 0431-Keep a hard copy on site and abide by approved plan of operation

Performance Standards

- 0290-Must not pose a threat to human health or environment
- 0291-Protects from ground water contamination
- 0292-The facility must conform to the approved local comprehensive solid waste management plan
- 0293-Complies with RCW 70.94 Emission or ambient air quality standards
- 0294-Complies with all other local/state/federal laws and regulations

Permit Requirement

- 0438 - Permit required

Plan of Operation

- 0432 - Safety equipment listed in plan of operation must be on-site and working (shower, eyewash)


OUT

- 0433 - Equipment, structures and systems are inspected as required by plan of operation and logs kept
- 0434 - Odor mgmt. plan must be followed to control nuisance odors by waste or leachate residual
- 0435 - Any additional requirements by Public Health are followed as outlined on the plan of operatio

Attachment H

Ridwell


Kelley Home Find Friends Create



Ridwell
@getridwell

Home
Posts
Reviews
Videos
Photos
About
Community

Create a Page




Like Follow Share Learn More Send Message

Write a post...


Photo/Video Tag Friends Check in

Posts

 **Ridwell**
February 18 at 9:37 AM ·

We're headed North! Hundreds of families in Edmonds & Woodway already have Ridwell. Lynnwood, Mountlake Terrace, and a few others are coming soon.


Sign up to help us come to you <https://get.ridwell.com/north>
<https://www.heraldnet.com/.../soft-plastic-recycling-service.../>



HERALDNET.COM
Soft plastic recycling service expands to Snohomish County | HeraldNet.com

114 7 Comments 26 Shares

Like Comment Share

 **Ridwell**
January 30 at 2:44 PM ·

That is one of the biggest trucks we've ever seen filled with Styrofoam! Clayton and the rest of us are excited to help you recycle it so it doesn't end up in our landfills and instead is turned into things like picture frames and molding.

Local Service in Seattle, Washington
ABOUT RIDWELL

It all started with a son, a dad, and a bag of ...

Ryan knew that batteries had chemicals in them so began researching where in Seattle to dispose of t...

See More

Community See All

Invite your friends to like this Page

1,363 people like this

1,514 people follow this

3 check-ins

About See All

Typically replies within an hour
Send Message

www.getridwell.com

Local Service


Suggest Edits


Page Transparency See More

Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.

Page created - August 28, 2018

Related Pages

 **Red Table Talk**
Shauna Marie likes this Show Like

 **Congresswoman Pr...**
Government Official Like



getridwell

Follow



52 posts

1,153 followers

82 following

Ridwell

Wasting less, made easy.

Get pickups from your 🏠
Keep stuff out of the landfill 🗑️
Do good in your community ❤️
Save the 🌍
ridwell.com

POSTS

TAGGED



Attachment I



PERMIT APPLICATION FOR COMMON CARRIER OF PROPERTY Excluding Household Goods

621 Woodland Square Loop SE
Lacey, WA 98503
PO Box 47250
Olympia, WA 98504-7250
Phone: 360-664-1222
Email transportation@utc.wa.gov
Website www.utc.wa.gov

Intrastate Common Carriers hauling general commodities (excluding household goods) must apply for and receive a permit from the commission to haul for-hire in Washington state. Household Goods carriers and Freight Brokers require a different application.

DEFINITIONS

- **UNIFIED BUSINESS IDENTIFIER (UBI) NUMBER:** Companies hauling for-hire within Washington must have a UBI number from the Department of Revenue’s Business License Services; (800) 451-7985. If you are a Corporation or Limited Liability Company you also must be registered with the Washington Secretary of State’s office; (360) 725-0377.
- **LEGAL NAME:** The legal name must be an individual, partnership, corporation, or limited liability company (LLC) and must be the **SAME** as registered under your UBI number, the name associated with your USDOT number, and your proof of insurance. If you are a corporation or limited liability company, the name must also match the name registered with the Secretary of State’s office.
- **TRADE NAME(s):** List trade name(s), if any, you intend to operate under other than your legal name. All trade name(s) must be registered under your UBI number.
- **USDOT NUMBER - Intrastate:** Any applicant operating a vehicle or a vehicle trailer combination with a GVWR of 16,001 pounds or more, or any applicant hauling hazardous materials requiring a placard, must obtain a USDOT number, as required by the Washington State Patrol (WSP). Apply for a USDOT number online at www.fmcsa.dot.gov/registration or call WSP at (360) 596-3812 or the Federal Motor Carrier Safety Administration (FMCSA) at (360) 753-9875 for assistance.
- **HAZARDOUS MATERIALS:** Complete the supplemental Hazardous Materials Safety Fitness Survey.

CONTACTS FOR ADDITIONAL ASSISTANCE

Vehicle licenses, Titles, Registrations	WA Dept of Licensing	(360) 902-3770	www.dol.wa.gov
Commercial driver’s licenses (CDL), Medical waivers	WA Dept of Licensing	(360) 902-3619	www.dol.wa.gov
Prorate, IRP, Reciprocity IFTA, Fuel bonds, Fuel permits, Fuel tax	WA Dept of Licensing	(360) 664-1858	www.dol.wa.gov
Oversize and overweight permits, log tolerance	WA Dept of Transportation	(360) 704-6340	www.wsdot.wa.gov
Commercial vehicle size and weight, Driver and equipment safety, Hazardous material regulations, Ports of entry, Scales	WA State Patrol	(360) 596-3800	www.wsp.wa.gov

**PERMIT APPLICATION FOR
COMMON CARRIER OF PROPERTY
Excluding Household Goods**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
621 Woodland Square Loop SE, Lacey, WA 98503, PO Box 47250, Olympia, WA 98504-7250
Telephone: (360) 664-1222 Email: transportation@utc.wa.gov

<i>FOR OFFICIAL USE ONLY</i>	
Receipt Number 111-0268-200-02	Date Received Payment ID
TYPE OF APPLICATION (defined in WAC 480-14-040)	
New Common Carrier Permit Authority	Extension of Common Carrier Permit Authority
<input checked="" type="checkbox"/> \$275 GENERAL COMMODITIES ONLY	<input type="checkbox"/> \$100 GENERAL COMMODITIES, including ARMORED CAR SERVICE
<input type="checkbox"/> \$275 GENERAL COMMODITIES, including ARMORED CAR SERVICE	<input type="checkbox"/> \$100 GENERAL COMMODITIES, including HAZARDOUS MATERIALS
<input type="checkbox"/> \$275 GENERAL COMMODITIES, including HAZARDOUS MATERIALS	<input type="checkbox"/> \$100 GENERAL COMMODITIES, including HAZARDOUS MATERIALS and ARMORED CAR SERVICE
<input type="checkbox"/> \$275 GENERAL COMMODITIES, INCLUDING HAZARDOUS MATERIALS and ARMORED CAR SERVICE	*You must complete the Supplementary Hazardous Materials Safety Survey if hauling any hazardous materials.

MOTOR CARRIER INFORMATION	
Legal Name:	Ridwell, Inc.
Trade Name(s)/dba(s), if any:	
Contact Name:	Ryan Metzger
Email:	ryan@ridwell.com
Phone:	(206) 920-8106
Fax:	n/a
Business (Mailing) Address:	PO Box 19737 Seattle, WA 98109
Physical Address (if different):	312 W. Republican St. Unit A Seattle, WA 98119
Unified Business Identifier Number (UBI):	604331559

USDOT: OR Check if under 16,001 GVW

Have you or your company ever been cited for business-related violations of state law or commission rule or any other federal or state agency?

If yes, please explain

TYPE OF BUSINESS

Check the type of business. If other than INDIVIDUAL, list the names of all shareholders, partners, or members and their percentage of interest in the company.


Individual Partnership Corporation Limited Liability Company

State of Incorporation: WA Other DE

NAME	TITLE	Stock Distribution or % of Owned Shares
Ryan Metzger	CEO/co-founder	29%
other co-founders	co-founder	24%
additional shareholders	private investors	47%

CERTIFICATION

I, as applicant, understand that the filing of this application does not in itself constitute authority to operate and that no operations may be conducted until a permit is issued by the Commission. I hereby declare and affirm that the information contained in this application is true to the best of my knowledge and belief.



Applicant Name

Jan 17, 2020

Date

You must keep a copy of your permit in your vehicle.

INSURANCE REQUIREMENTS (check one) A permit will not be issued until acceptable insurance is received	
<input checked="" type="checkbox"/> Vehicle GVWR Less than 10,000 pounds <input checked="" type="checkbox"/> Will not haul hazardous materials <input checked="" type="checkbox"/> You must obtain \$300,000 in Public Liability and Property Damage Insurance	<p>Applicants must have their insurance company file proof of liability and property damage insurance covering each vehicle used under the permit.</p> <p>To prevent delay attach a temporary Certificate of Liability from your insurance company. Your insurance company must provide a Form E within 60 days.</p> <ul style="list-style-type: none"> ➤ The name on the insurance must match your company's legal name exactly. ➤ Proof of insurance must be on either a uniform motor carrier bodily injury property damage liability certificate of insurance (FORM E) or a temporary Certificate of Liability, good for only 60 days. ➤ Your insurance company must file the required FORM E within 60 days or your permit will be cancelled. ➤ The Certificate of Liability must show the Washington Utilities and Transportation Commission as the Certificate Holder. ➤ You may provide a copy with your application.
<input type="checkbox"/> Vehicle GVWR more than 10,000 pounds <input checked="" type="checkbox"/> Will not haul hazardous materials <input checked="" type="checkbox"/> You must obtain \$750,000 in Public Liability and Property Damage Insurance	
<input type="checkbox"/> Hazardous Materials (\$1,000,000) <input checked="" type="checkbox"/> Will haul hazardous materials requiring \$1 million in Public Liability and Property Damage Insurance <input checked="" type="checkbox"/> Complete Part B, Section 1 and 2	
<input type="checkbox"/> Hazardous Materials (\$5,000,000) <input checked="" type="checkbox"/> Will haul hazardous materials requiring \$5 million in Public Liability and Property Damage Insurance <input checked="" type="checkbox"/> Complete Part B, Section 1 and 2	

FILING YOUR APPLICATION

Select one of the following:

- Scan/PDF your application and upload to efileapp.utc.wa.gov and pay online at payments.utc.wa.gov, or,
- Mail your application **with** your check or money order to the following address:
 UTC, PO Box 47250, Olympia, WA 98504-7250

ACH online (no service fee) or credit card online at payments.utc.wa.gov (2.5% or minimum of \$3.95 is charged by Official Payments for credit card processing).

DO NOT EMAIL YOUR CREDIT CARD INFORMATION



PO Box 3199 • Winston Salem, NC 27102-3199

RIDWELL INC.
PO BOX 19737
SEATTLE WA 98109

Policy Number: 2007846235
 Named Insured: **RIDWELL INC.**
 Policy Period: **6/7/2019 - 6/7/2020**
 Date of Notice: 01/13/2020 11:31 AM
 Policy Underwritten By: **Integon National Insurance Company**
24 Hour Claim Reporting: 1-800-468-3466
For Policy Information: 1-877-468-3466
www.MyNatGenPolicy.com

Your Agent:
Insurance Services Group Inc
 600 Main St Ste A
 Edmonds WA 98020
 (425) 775-6446

WA COMMERCIAL VEHICLE DECLARATIONS PAGE

Endorsement Effective 01/13/2020 11:31 AM

The following changes were made to your policy - Driver Information Updated

Drivers, Employees and Household Residents

#	Name	Driver Status	License #	Lic State	Date of Birth	Gender	Marital Status	Driver Pts	Yrs. Licensed
#1	Ryan Metzger	Owner Driver	XXXX143B	WA	4/25/1979	Male	Married	0	24
#2	Aliya Marder	Employee	XXXX18JW	WA	4/16/1989	Female	Married	0	14
#3	David Dawson	Employee	XXXX213B	WA	2/6/1983	Male	Married	0	20
#4	Justin Gough	Employee	XXXX86J1	WA	4/21/1982	Male	Married	0	21
#5	Qasim Campbell	Employee	XXXXC6FB	WA	12/21/1981	Male	Single	2	21
	Accidents/Violations Description								
	#3	Date: 5/13/2017	Defective equipment, Improper use of lights/signal						
	#4	Date: 11/24/2017	Speeding: minor <=15 mph over speed limit						
#6	Dan Fair	Employee	XXXX09B6	WA	1/26/1990	Male	Single	0	13
#7	Tomas Minotas	Employee	XXXX0116	IL	4/23/1980	Male	Single	0	23
#8	Clayton Walker	Employee	XXXX08QP	WA	11/17/1980	Male	Single	0	22

10039WA (06012014)

#9 Jill Weidman

Driver Status	License #	Lic State	Date of Birth	Gender	Marital Status	Driver Pts	Yrs. Licensed
Employee	XXXX61KL	WA	5/13/1994	Female	Single	0	9

Insured Vehicle(s) and Schedule of Coverages

#1	2011 FORD ECONOLINE E250 VAN	VIN: 1FTNE2EW6BDA99712- JA2119	Usage: Business Use Only	Radius: 100
	Garaging Location:	98103		
	Policy Coverage Level	ScheduledAuto		
	Coverages Provided	Limits/Deductibles		Premium
	Bodily Injury / Property Damage - Combined Single Limit	\$500,000 Combined Single Limit		\$2,220.00
	Medical Payments	\$5,000 Each Person / Each Accident		\$76.00
	Custom Equipment	\$1,000		Included
	Underinsured Motorist Combined Single Limit	\$500,000 Combined Single Limit		\$325.00
	Comprehensive	Actual Cash Value - \$500 Deductible		\$91.00
	Collision	Actual Cash Value - \$500 Deductible		\$426.00
		Total for this Vehicle		\$3,138.00
		Combined Vehicle Premium		\$3,138.00
		Acquisition Expense		\$20.00
		Total 12 Month Policy Premium		\$3,158.00

Discounts Applied**Policy Level**

Paperless Discount
Package Discount

Important Notice

Online Policy Documents: Your policy form and coverage endorsements may be viewed by going to our website: www.MyNatGenPolicy.com. Click on the Policy Documents link at the top and enter your Policy Number and Last Name.

Additional Policy Information

Insured email: ryan@ridwell.com

Tier 7

Disclosure of Possible Additional Charges

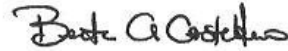
The amounts below are authorized for use in this state. However, they are only charged if they apply to your policy.

Acquisition Expense	\$20.00
Additional Insured Charge	\$25.00
Convenience Fee	\$5.00
Federal Filing Fee	\$50.00
Form E Filing Charge	\$50.00
FR Filing Charge	\$50.00
Late Charge	\$10.00
Nonsufficient Funds Charge	\$35.00
Reinstatement Charge - Federal Filing	\$100.00
Reinstatement Charge - No Federal Filing	\$20.00
Waiver of Subrogation	\$25.00

10039WA (06012014)

Forms and Endorsements

Form	Edition	Form Name
10150	01012014	NUCLEAR ENERGY LIABILITY EXCLUSION
11347	09012014	COMMERCIAL AUTO POLICY



Authorized Signature

10039WA (06012014)



Attachment J

**SOLID WASTE COLLECTION COMPANY
UNDER CHAPTER RCW 81.77.040**

Lacey, WA 98503
PO Box 47250
Olympia, WA 98504-7250
Phone: 360-664-1222
Website: www.utc.wa.gov

This application packet contains the following information:

- Application Forms
- Sample Standard Tariff Format
- WAC 480-70 – Rules Relating to Solid Waste Collection Companies
- *“Your Guide to Achieving a Satisfactory Safety Rating”*

You may not begin operations as a solid waste collection company until you are granted authority and a solid waste certificate is issued by the Utilities and Transportation Commission (Commission). Applications are subject to public notice and protest and may be set for a hearing.

You must file and maintain Public Liability and Property Damage Insurance (Form E) with the Commission covering each vehicle operating under your solid waste certificate in the state of Washington. The Commission must be shown as the certificate holder.

Per WAC 480-70-181, insurance or bond minimum limits are:

Vehicles less than 10,000 GVWR	\$300,00 combined single limit of public liability and property damage insurance – Form E
Vehicles 10,000 GVWR and more	\$750,000 combined single limit of public liability and property damage insurance – Form E
Transport quantities of biomedical waste not subject to federal regulation	\$1,000,000 combined single limit of public liability and property damage insurance – Form E
Transport quantities of hazardous or biomedical waste that are subject to federal regulation	The federal minimum combined single limit coverage (see Title 49 CFR Part 387.301 & 303)

You may contact our Licensing Services staff for assistance at 360-664-1222. Our Compliance staff can be reached at 360-664-1244. The Commission has a policy of providing equal access to its services. If you need special accommodations, please call 360-664-1133 or to TTY, 800-416-5289.

Please submit application forms, appropriate attachments, and proof of insurance to the address below:

Utilities and Transportation Commission
621 Woodland Square Loop SE, Lacey, WA 98503
PO Box 47250
Olympia, WA 98504-7250

Please refer to our website at <http://www.utc.wa.gov/regulatedIndustries/transportation/solidwaste> for WORD and PDF versions of this application, standard tariff format, adoption notice, etc.

Checklist for a completed application

- Type of authority requested – check one
 - Make sure appropriate Attachment is completed and attached.
- Correct fees
- Legal Name – as registered with Business Services Licensing
 - If corporation or LLC, name must match registration with Secretary of State’s office.
- Trade Name(s) – as registered with Business Services Licensing
- Physical address – Mailing address also if different from physical address
- Phone, Fax and email address
- USDOT number – all carriers must have one. The legal name on the USDOT must match how you are applying for this authority.
- UBI number – as registered with the Business Service Licensing
- Type of Business Structure
 - If Partnership, Corporation, or Other, list members of partnership, corporation or LLC and their percentages. Corporation must be registered with the Secretary of State’s office.
- Indicate the commodity you plan on hauling
- A complete description of the proposed service including the line, route, or service territory described in terms such as streets, avenues, roads, highways, townships, ranges, cities, towns, counties, or other geographic descriptions.
- Map of the proposed line, route, or service territory that meets standards described in WAC 480-30-051.
- A statement of conditions that justify the proposed service.
- A statement of the applicant’s prior experience and knowledge of transportation or solid waste, including motor carrier driver and equipment safety requirements.
- Financial Statement of assets and liabilities, as well as a balance sheet or business plan.
- Will you operate under a contract? If so, attach a copy of contract.
- Proposed rates and tariff – sample tariff pages attached.
- A list of equipment to be used in providing the proposed service (indicate whether the equipment is owned, leased or planning on purchasing)
- Safety & Operations – complete with person and position that will be responsible for understanding and complying with the requirements.
- Operational Responsibilities - completed with person and position that will be responsible for understanding and complying with the requirements.
- Hearing information – just in case your application is scheduled for a formal hearing.
- Declaration of Application – make sure application is signed and dated



621 Woodland Square Loop SE
 Lacey, WA 98503
 PO Box 47250
 Olympia, WA 98504-7250
 Phone: 360-664-1222
 www.utc.wa.gov

APPLICATION FOR A SOLID WASTE COLLECTION COMPANY CERTIFICATE

Type of Solid Waste Authority Requested	<u>Fee Required</u>
<p><u>Permanent Authority</u> – (check appropriate box below) Complete entire application and submit a proposed tariff as outlined in the standard tariff form. (WAC 480-70-091)</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> New Certificate <input type="checkbox"/> Extension of Certificate G-_____ <input type="checkbox"/> Transfer of authority – Certificate G-_____ <ul style="list-style-type: none"> o Complete Attachment B <input type="checkbox"/> Lease of authority – Certificate G-_____ <ul style="list-style-type: none"> o Complete Attachment B <input type="checkbox"/> Reinstatement of cancelled authority – Certificate G-_____ (must be filed within 30 days of cancellation). Include a statement justifying the reinstatement and complete sections 1, 2, and 8 	\$200
<p><u>Temporary Authority</u> – (WAC 480-70-131)</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> New temporary authority <ul style="list-style-type: none"> o Complete Attachment A <input type="checkbox"/> Temporary authority to operate pending a commission decision on a concurrently filed certificate application. <input type="checkbox"/> Expedited temporary authority – to meet an immediate or urgent need for a period of not more than 30 days <ul style="list-style-type: none"> o Complete Attachment A 	\$25
<p><u>Name Change</u> – (WAC 480-70-121) There can be no change in ownership.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Change of corporate name <input type="checkbox"/> Change of trade name <input type="checkbox"/> Addition or new trade name <input type="checkbox"/> Change of surname of an individual owner or partner <ul style="list-style-type: none"> o Complete Attachment C 	\$35
<p><u>Mortgage</u> – including requests for permission to mortgage or otherwise encumber a certificate (WAC 480-70-116)</p> <ul style="list-style-type: none"> o Complete Attachment D 	\$35

<i>FOR OFFICIAL USE ONLY</i>			
Date Filed:	Insurance:	Docket #-TG-	Cert Issued: G-
Staff Assigned:	Tariff:	ID #:	Map:
DOL/SOL:	Receipt ID:	227 02 032-20	Related App ID#:

FILING YOUR APPLICATION

Select one of the following:

- Scan/PDF your application to efileapp.utc.wa.gov and pay online at payments.utc.wa.gov, or,
- Mail your application **with** your check or money order to the following address:
UTC, PO Box 47250, Olympia, WA 98504-7250

ACH online (no service fee) or credit card online at payments.utc.wa.gov (2.5% or minimum of \$3.95 is charged by Official Payments for credit card processing).

DO NOT EMAIL YOUR CREDIT CARD INFORMATION

SECTION 1 – APPLICANT INFORMATION

Legal Name of Applicant: Ridwell, Inc.

Trade Name(s) (if applicable): _____

Business Address

Mailing Address (if different from Business Address)

Street: 312 W. Republican St. Unit A

Street: PO Box 19737

City/State/Zip: Seattle, WA 98119

City/State/Zip: Seattle, WA 98109

Phone Number: (206) 483-2843

Fax Number: n/a

Email: ryan@ridwell.com

USDOT number: 3382959

SECTION 2 – BUSINESS INFORMATION

Unified Business Identifier #: 604331559

State of Inc. DE

Type of business structure: Individual Partnership Corporation Other (LP, LLP, LLC)

List the name, title, and percentage of partner or member's share, or stock distribution for major stockholders.

<u>Name</u>	<u>Title</u>	<u>Stock Distribution or % of Shares</u>
<u>Ryan Metzger</u>	<u>CEO / Co-Founder</u>	<u>29%</u>
<u>Aliya Marder</u>	<u>Head of Product / Co-founder</u>	<u>8%</u>
<u>Other founders/investors</u>	<u>Co-founder / Investors</u>	<u>63%</u>

Do you currently hold, or have you ever held a solid waste certificate?
 No Yes If yes, please indicate your certificate number: G- _____

Have you ever applied for and been denied a certificate to transport solid waste?
 No Yes If yes, please explain: _____

Indicate the commodity to be hauled: Items for reuse and recyclable categories restricted to those not identified as available through curbside collection where we operate

Please describe the territory in which you wish to operate, include the name, address, and county for disposal of waste and the name, address and county where residential recycling materials will be delivered. (NOTE: Territory must be described using boundaries such as streets, avenues, roads, highways, townships, ranges, city limits, county boundaries or other geographic description:

Our service territory is based on areas where there is customer demand as measured by signups on our mailing list.
There are currently over 20,000 people on our mailing list with 95% of them residing in Washington state zip codes.
The largest number of people expressing interest reside in King, Snohomish, and Pierce counties, so that is where we
wish to operate first. Coverage area, including those three counties are highlighted in the attached maps. We will begin
with the specific zip codes within those counties that have expressed the most interest.

Please attach a map that meet the requirements of WAC [480-70-056](#) and clearly shows the territory described above.

State below the conditions that justify granting of this application. If you are applying for temporary certificate authority, be sure your statement addresses and support the question of “immediate and urgent need”.

Keeping material out of landfills and instead reusing or recycling it is important to residents of Washington state. Options exist for people to do this outside of traditional solid waste services. Customers are encouraged to take in-kind donations to non-profit organizations, or specialized recyclables to places like hardware stores or grocers. For those without the time or the means to drive these specialized categories themselves, we provide an alternative at an affordable price that our customers voluntary choose to pay.

Please tell us about your experience and knowledge of transportation or solid waste, including knowledge of motor carrier driver and equipment safety requirements:

Have diverted many thousands of pounds of materials from landfills that was not identified as recyclable by traditional solid waste companies. We have a perfect safety record while doing so and have worked collaboratively with the King County Department of Public Health to ensure safe and healthy operating procedures are being followed.

Have you or your company ever been cited for business-related violation of state laws or commission rule or any other federal or state agency?

No Yes If yes, please explain _____

SECTION 3 – FINANCIAL STATEMENT

Please include a Balance Sheet, Profit and Loss Statement, or business plan.

ASSETS		LIABILITIES	
Cash in Bank	\$ 3,680,752	Salaries/Wages Payable	\$ 1,455
Notes Receivable	\$	Accounts Payable	\$ 30,722
Accounts Receivable	\$ 25,954	Notes Payable	\$
Investments	\$	Mortgages Payable	\$
Other Current Assets	\$ 4,700	Contracts and Bonds Payable	\$
Prepaid Expenses	\$ 5,780	TOTAL LIABILITIES	\$ 319,968
Land and Buildings	\$	NET WORTH	
Trucks and Trailers	\$ 9,408	Preferred Stock	\$ 4,049,998
Office Furniture	\$	Common Stock	\$
Other Equipment	\$ 160,402	Retained Earnings	\$ (482,969)
Other Assets	\$	Capital	\$
TOTAL ASSETS	\$ 3,886,996	TOTAL LIABILITIES AND NET WORTH	\$ 3,886,996

SECTION 4 - RATES AND TARIFFS

Is this application to operate under a contract? No Yes If yes, submit a copy of each contact under which service will be performed. The contract must contain all the elements states in [WAC 480-70-146](#).

If this application is for temporary authority, a new certificate, or extension of existing certificated authority, you must attach a copy of your proposed tariff using either the standard tariff format included in this package, or an approved alternate format. All tariffs must comply with the provisions of WAC [480-70-226](#) through WAC 480-70-351.

If this application is for a transfer or lease of authority from an existing certificate, you must either file a new tariff at the same rate levels as on file, or you must adopt the current certificate holder's tariff. To file a new tariff, use the standard tariff format (www.utc.wa.gov) or you must seek approval to use an alternate format.

Indicate which option you will use: Check one - Adopt File New Tariff

SECTION 5 - EQUIPMENT LIST

Describe the equipment that will be used (attach additional sheets if necessary)

Ownership: Lease, own, or plan to purchase?	Year	Make	License Number	Vehicle ID number	Gross Vehicle Weight	Type of Vehicle
Own	2011	Ford	C55085M	1FNE2EW6BDA99712JA2119	8,900	Econoline E250 Cargo Van

SECTION 6 - SAFETY AND OPERATIONS

In each of the categories show below, list the person and position responsible for understanding and complying with the Federal Motor Carrier Safety Regulations (FMCSR) and Washington State laws and rules. Please refer to the WAC rules, Fact Sheets, and publication "Your Guide to Achieving a Satisfactory Safety Rating" for assistance with requirements that may apply to your specific operations.

SAFETY RESPONSIBILITIES	
COMMERCIAL DRIVERS LICENSE (CDL) REQUIREMENTS (Title 49, Code of Federal Regulations Part 383) Any driver who operates a vehicle that meets the definition of a commercial motor vehicle must have a valid CDL.	
Name: n/a - we don't use vehicles requiring a CDL	Position: n/a
DRIVER QUALIFICATION REQUIREMENTS (Title 49, Code of Federal Regulations Part 391) Driver's must meet minimum qualification requirements and each company must maintain driver qualification files for each driver.	
Name: n/a - we don't use vehicles requiring a CDL	Position: n/a
DRIVERS HOURS OF SERVICE (Title 49, Code of Federal Regulations Part 395) Drivers must maintain logs and each company must maintain true and accurate hours of service records for each driver.	
Name: n/a - we don't use vehicles requiring a CDL and drivers operate exclusively within a 100 air-mile radius.	Position: n/a
CONTROLLED SUBSTANCES AND ALCOHOL TESTING (Part 382) All persons who drive commercial vehicles requiring a CDL must be in a Controlled Substance and Alcohol Testing program that complies with the FMCSR in 49 CFR Part 382 and 49 CFR Part 40.	
Each company will have in place a system for complying with FMCSR governing alcohol and controlled substances testing requirements (49 CFR Part 382 and 49 CFR Part 40).	
Name: n/a - we don't use vehicles requiring a CDL	Position: n/a
INSPECTION, REPAIR AND MAINTENANCE (Title 49, Code of Federal Regulations Part 396) Every motor carrier shall systematically inspect, repair, and maintain all motor vehicles subject to its control.	
Name: Justin Gough	Position: Head of Operations

OPERATIONAL RESPONSIBILITIES	
TARIFF RATES AND CHARGES (WAC 480-70-226 through WAC 480-70-351) Companies must file with the Commission a tariff showing all rates and charges it will charge its customers, together with rules that govern how rates and charges will be assessed.	
Name: n/a - see Request for Determination of Applicability	Position: n/a
ANNUAL REPORTS and REGULATORY FEES (WAC 480-70-071 & 076) Companies must annually file a report of their financial operations and pay regulatory fees.	
Name: Ryan Metzger	Position: CEO
BIOMEDICAL WASTE (WAC 480-70-426 through 476) Companies that transport biomedical waste must handle and transport that waste according to the appropriate requirements of the federal hazardous materials regulations (49 CFR Parts 170-189) and the additional requirements in these rules.	
Name: n/a - we do not transport biomedical waste	Position: n/a
CUSTOMER SERVICE –Person responsible for customer service complaints, customer notice requirements, and compliance with county solid waste plans.	
Name: Aliya Marder	Position: Head of Product
STATE OF WASHINGTON – general laws, rules and regulations: Individuals and companies doing business in the state of Washington must comply with the regulations of local, state, and federal agencies. Please state the name and position of the person in your organization who will be responsible for ensuring compliance with the laws of the state of Washington, such as, <u>but not limited to:</u> Department of Labor and Industries (industrial insurance, safety, prevailing wage); Department of Licensing (vehicle and drivers licenses, business licensing, Unified Business Identifier (UBI number), fuel permits, fuel tax); Secretary of State (corporate registrations); Department of Transportation (over-size or over-weight permits); Department of Revenue, Internal Revenue Service (taxes); and Employment Security.	
Name: Ryan Metzger	Position: CEO

SECTION 7 – HEARING INFORMATION

If the Commission assigns this application for formal hearing, estimate the number of witnesses you will present and the amount of time you will need for your presentation.	
Number of witnesses: 15	Amount of time: 30 minutes
Will an attorney be representing you? If yes, complete the following:	
Attorney's name: Jay Derr, Van Ness Feldman	Attorney's phone number:
Attorney's address:	Fax Number: (206) 623-4986
Street: 719 Second Ave. Suite 1150 City, State, Zip: Seattle, WA 98104	E-mail: jpd@vnf.com

SECTION 8 - DECLARATION OF APPLICANT

I understand that filing this application **does not** in itself constitute authority to operate as a solid waste collection company. As the applicant for a solid waste collections company certificate, I understand the responsibilities of a solid waste collection company, and I am in compliance with all local, state, and federal regulations governing business in the state of Washington. I certify under penalty of perjury under the laws of the State of Washington that the information contained in this application is true and correct.

Printed name of applicant: Ryan Metzger

Signature of application:  Title: CEO

Date: February 4, 2020 County/State: King/Washington



ATTACHMENT A

TEMPORARY CERTIFICATE OR EXPEDITED TEMPORARY AUTHORITY SUPPORT STATEMENT

Temporary certificate applications and Expedited Temporary Authority applications must include sworn statements from one or more potential customers identifying all pertinent facts relating to an immediate and urgent need for service.

Applicant Name: Ridwell, Inc.

CUSTOMER SWORN STATEMENT OF IMMEDIATE AND URGENT NEED FOR SERVICE

Customer Name: Edith Bookstein

Address: 1505 11th Ave, Seattle WA, 98122

Phone Number: (206) 200-9990 Fax Number: N/A Email: edebookst@gmail.com

Describe the immediate and urgent need for the requested service:

First of all, I'm in a wheelchair. I can't drive around from place to place getting rid of my stuff the right way. I am intense about recycling. My kids have called me Mrs. Green since they were young.

The amount of plastic film I accumulate in two weeks is astonishing. I am thrilled to be able to recycle it and I hated just throwing it away. And the fact that Ridwell picks up threads and batteries and everything else. I also find huge value in the creativity of the rotating categories for donation. Those are things I can't do myself!

If there is an existing company providing the service in the territory, please indicate the existing Company's name (if applicable): No

Explain why the current company is not able to provide you service: Not applicable

What date(s) do you need the service? Immediately

What do you need transported? Plastic film, Styrofoam, light bulbs, batteries, threads, and categories for donation

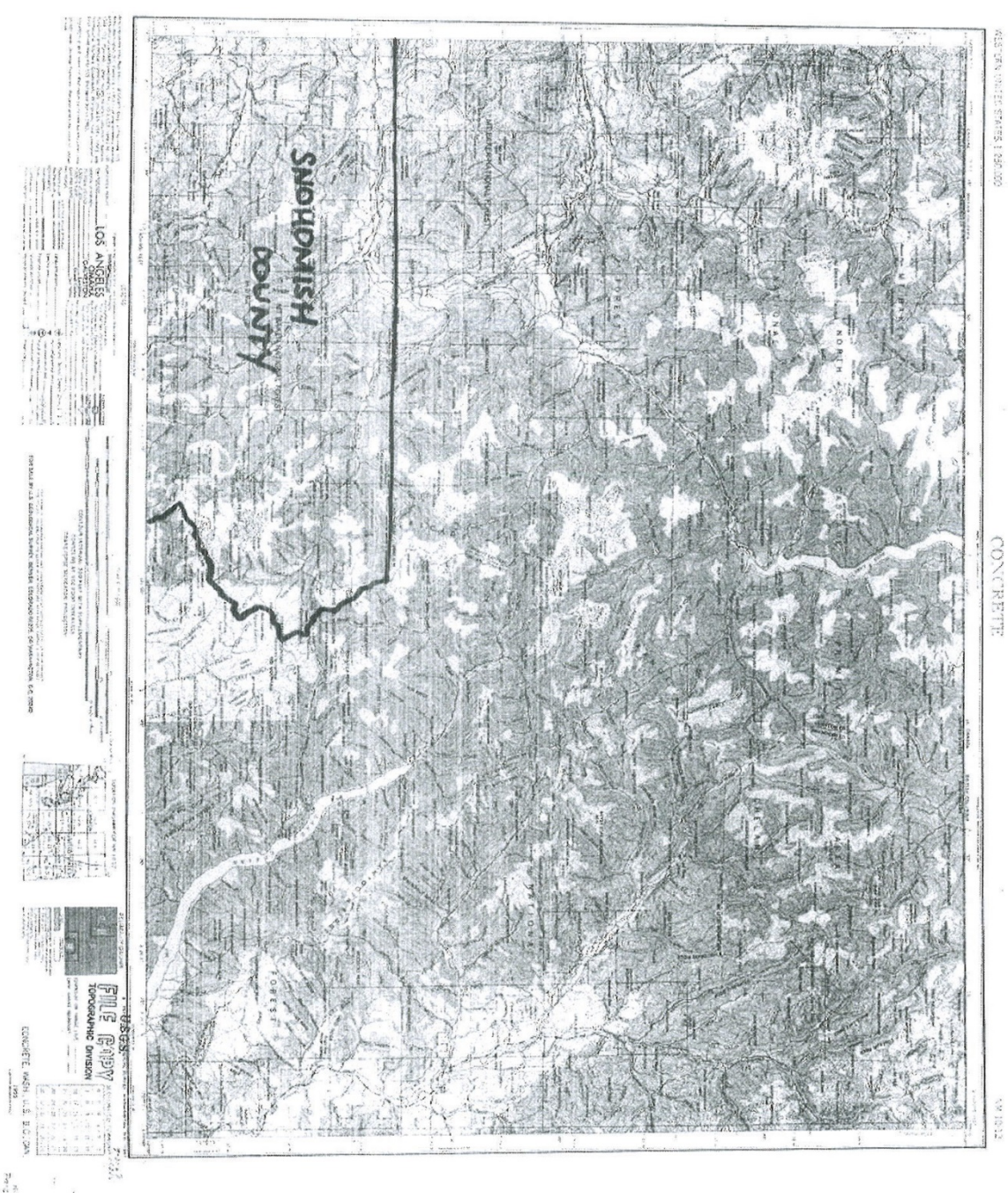
Number of days, trips, loads: Every two weeks

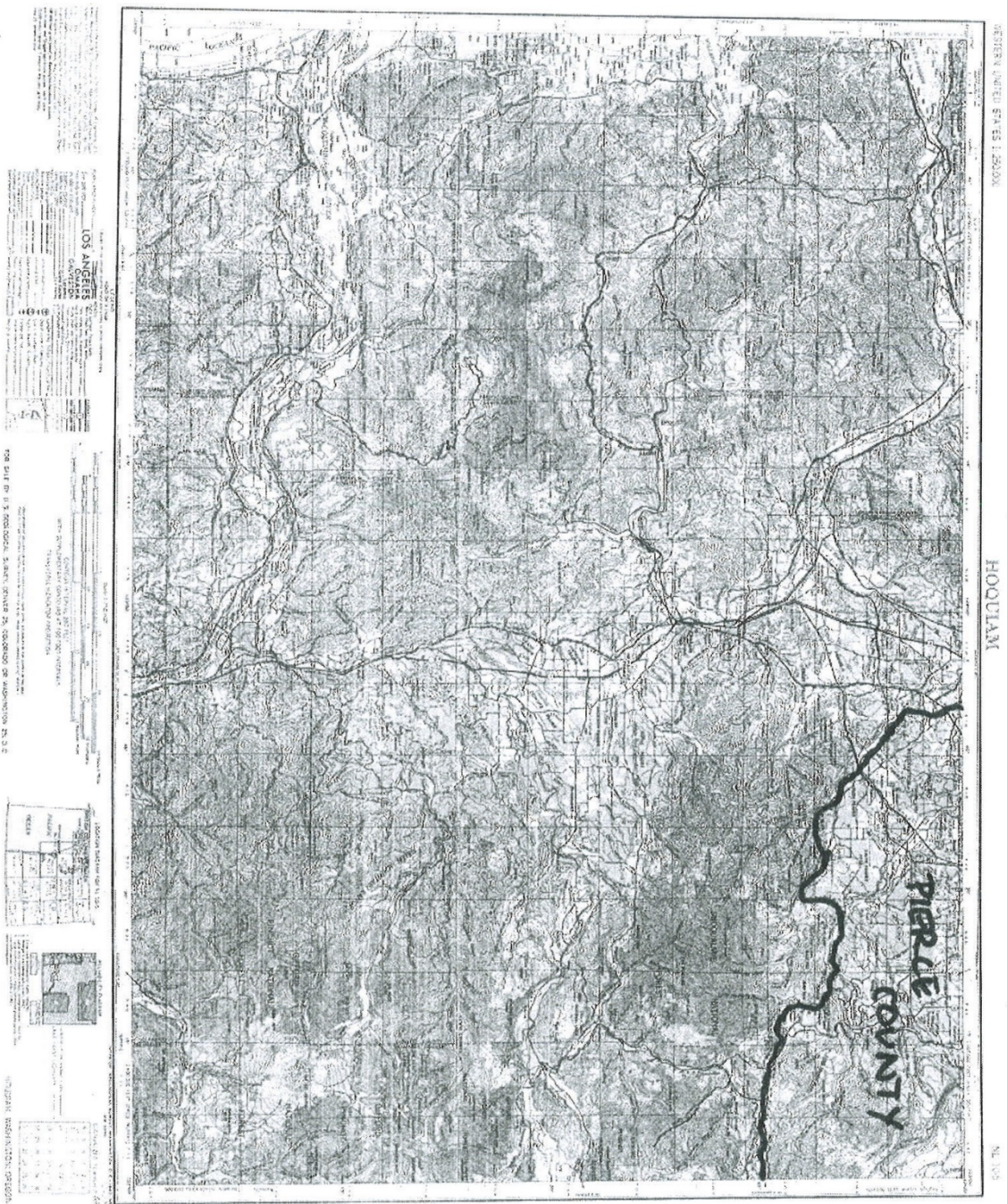
Transported from: My home To: Recycling and reuse partners

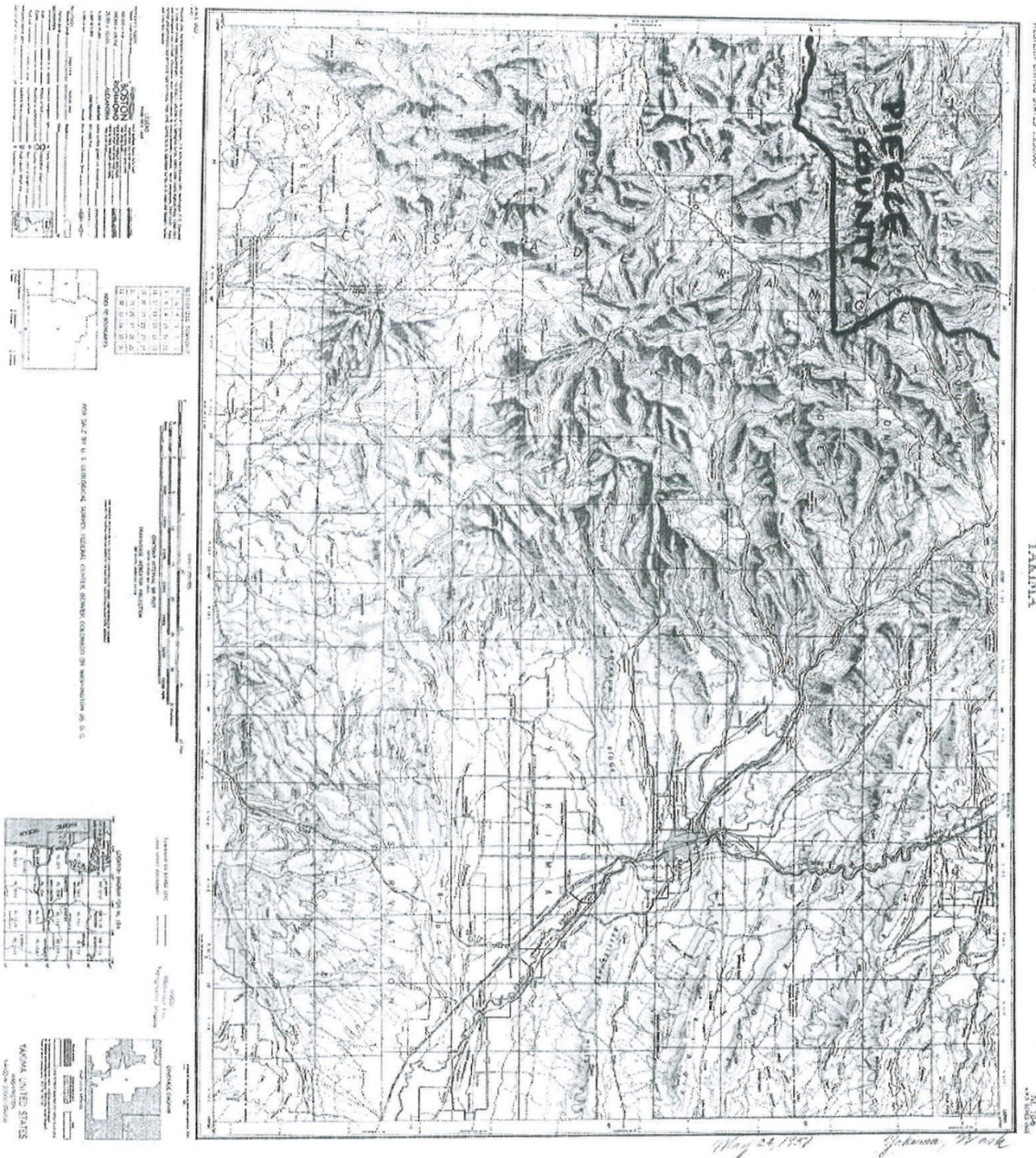
I certify or declare under penalty of perjury under the laws of the state of Washington that the information contained in this statement is true and correct.

EDITH BOOKSTEIN [Signature] 1/14/20
Print Name Signature Date, County, State

*This form is not required to be filed for an application for temporary authority to operate an existing certificate pending the outcome of an application to transfer permanent authority.









Auto, Home & Health Insurance
PO Box 3199 • Winston Salem, NC 27102-3199

RIDWELL INC.
PO BOX 19737
SEATTLE WA 98109

Policy Number: 2007846235

Named Insured:
RIDWELL INC.

Policy Period:
6/7/2019 - 6/7/2020

Date of Notice: 01/13/2020 11:31 AM

Policy Underwritten By:
Integon National Insurance Company

24 Hour Claim Reporting: 1-800-468-3466

For Policy Information: 1-877-468-3466

www.MyNatGenPolicy.com

Your Agent:
Insurance Services Group Inc
600 Main St Ste A
Edmonds WA 98020
(425) 775-6446

WA COMMERCIAL VEHICLE DECLARATIONS PAGE

Endorsement Effective 01/13/2020 11:31 AM

The following changes were made to your policy - Driver Information Updated

Drivers, Employees and Household Residents

#	Driver Status	License #	Lic State	Date of Birth	Gender	Marital Status	Driver Pts	Yrs. Licensed
#1	Ryan Metzger Owner Driver	XXXX143B	WA	4/25/1979	Male	Married	0	24
#2	Aliya Marder Employee	XXXX18JW	WA	4/16/1989	Female	Married	0	14
#3	David Dawson Employee	XXXX213B	WA	2/6/1983	Male	Married	0	20
#4	Justin Gough Employee	XXXX86J1	WA	4/21/1982	Male	Married	0	21
#5	Qasim Campbell Employee	XXXXC6FB	WA	12/21/1981	Male	Single	2	21
	Accidents/Violations Description							
	#3	Date: 5/13/2017		Defective equipment, Improper use of lights/signal				
	#4	Date: 11/24/2017		Speeding: minor <=15 mph over speed limit				
#6	Dan Fair Employee	XXXX09B6	WA	1/26/1990	Male	Single	0	13
#7	Tomas Minotas Employee	XXXX0116	IL	4/23/1980	Male	Single	0	23
#8	Clayton Walker Employee	XXXX08QP	WA	11/17/1980	Male	Single	0	22

10039WA (06012014)

#9 Jill Weidman

Driver Status	License #	Lic State	Date of Birth	Gender	Marital Status	Driver Pts	Yrs. Licensed
Employee	XXXX61KL	WA	5/13/1994	Female	Single	0	9

Insured Vehicle(s) and Schedule of Coverages

#	Vehicle Description	VIN	Usage	Radius
#1	2011 FORD ECONOLINE E250 VAN	1FTNE2EW6BDA99712-JA2119	Business Use Only	100
Garaging Location:		98103		
Policy Coverage Level		ScheduledAuto		
Coverages Provided		Limits/Deductibles		Premium
Bodily Injury / Property Damage - Combined Single Limit		\$500,000 Combined Single Limit		\$2,220.00
Medical Payments		\$5,000 Each Person / Each Accident		\$76.00
Custom Equipment		\$1,000		Included
Underinsured Motorist Combined Single Limit		\$500,000 Combined Single Limit		\$325.00
Comprehensive		Actual Cash Value - \$500 Deductible		\$91.00
Collision		Actual Cash Value - \$500 Deductible		\$426.00
		Total for this Vehicle		\$3,138.00
Combined Vehicle Premium				\$3,138.00
Acquisition Expense				\$20.00
Total 12 Month Policy Premium				\$3,158.00

Discounts Applied**Policy Level**

Paperless Discount
Package Discount

Important Notice

Online Policy Documents: Your policy form and coverage endorsements may be viewed by going to our website: www.MyNatGenPolicy.com. Click on the Policy Documents link at the top and enter your Policy Number and Last Name.

Additional Policy Information

Insured email: ryan@ridwell.com

Tier 7

Disclosure of Possible Additional Charges

The amounts below are authorized for use in this state. However, they are only charged if they apply to your policy.

Acquisition Expense	\$20.00
Additional Insured Charge	\$25.00
Convenience Fee	\$5.00
Federal Filing Fee	\$50.00
Form E Filing Charge	\$50.00
FR Filing Charge	\$50.00
Late Charge	\$10.00
Nonsufficient Funds Charge	\$35.00
Reinstatement Charge - Federal Filing	\$100.00
Reinstatement Charge - No Federal Filing	\$20.00
Waiver of Subrogation	\$25.00

10039WA (06012014)

Forms and Endorsements

Form	Edition	Form Name
10150	01012014	NUCLEAR ENERGY LIABILITY EXCLUSION
11347	09012014	COMMERCIAL AUTO POLICY



Authorized Signature

10039WA (06012014)

Attachment K



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

May 3, 2019

Ryan Metzger
Aliya Metzger
Ridwell, Inc.
956 N 42nd St., Unit A
Seattle, WA 98103

Dear Mr. Metzger and Ms. Metzger:

The Washington Utilities and Transportation Commission (commission) believes you are engaged in services that require a solid waste certificate from the commission. The purpose of this letter is to provide technical assistance to you with respect to Washington's solid waste hauling requirements. Commission staff recently discovered that Ridwell, Inc. is advertising online and in social media for collection of recyclables.

Operating or advertising for collection of recyclables without the required solid waste certificate is illegal and subject to a penalty of \$1,000 per violation.¹ Under the law, advertising of solid waste collection services is evidence of operating as a solid waste hauler. Solid waste collection includes residential and commercial garbage, residential recycling, yard waste, and drop box service.

Without authority from the commission to haul solid waste or recycling in Washington state, Ridwell, Inc., may not advertise or provide these services. Until and unless the commission grants a solid waste certificate, Ridwell, Inc., must immediately cease providing all forms of solid waste collection services.

If you wish to offer solid waste collection services, you must first apply for authority as a solid waste collection company. Be advised, however, that your application (enclosed) will be subject to a public protest period and you will have to demonstrate that the existing solid waste company is not providing the service you propose to offer. The commission will only grant new solid waste authority if the existing certificated company is determined to be unfit, unwilling, or unable to provide the service.

¹ RCW 81.04.380

Respect. Professionalism. Integrity. Accountability.

May 2, 2019
Ryan Metzger
Aliya Metzger
Page 2

To avoid enforcement action by the commission, by May 16, 2019, please either submit a complete application for a solid waste certificate, or explain in writing why you believe your business does not require authority from the commission. Please explain the nature of your company's operations in detail.

Please direct your written response, to Kathryn.McPherson@utc.wa.gov or by mail to P.O. Box 47250, Olympia, WA 98504. You may also reach Ms. McPherson at 360-664-1108.

Sincerely,

Mike Turcott
Compliance Investigations Supervisor

Enclosures (2)

Attachment L



P.O. Box 19737 Seattle, WA 98109

RECEIVED
MAY 16 2019
WASH. UT. & TP. COMM

May 14, 2019

Kathryn McPherson
P.O. Box 47250
Olympia, WA 98504

Dear Ms. McPherson,

We received a letter dated May 3rd from Mike Turcott and wish to respond. First off, we really appreciate the offer to provide technical assistance as it relates to any possible coordination with your organization. We have a shared desire to provide residents of Washington with safe, reliable, and affordable service and look forward to working together to provide that.

Once we received the material your office provided, we reviewed it to determine how what we are providing overlaps with other organizations under your purview. We believe what we are doing is different for a few reasons:

1. We are not picking up garbage and are not transporting materials to landfills or transfer stations.
2. We are not picking up comingled recycling such as cardboard, aluminum, or glass, and do not bring materials to Material Recovery Facilities to be sorted and sent elsewhere.
3. Instead, we are providing something different by featuring categories for reuse or recycling that consumers are encouraged to take to partners on their own. We have found many people lack both the knowledge that these options exist and the time to bring things to them, so we have filled a need in our community by providing both at a low, monthly cost.
4. Many of the categories we pick up are actually things that are redistributed to community organizations for reuse rather than being underutilized in our customer's homes. To date, these have included eyeglasses, unused diapers, small kitchenware, food takeout utensils, books and several others.

For the reasons above, we have a very positive relationship with one of the largest haulers in the state, Recology, who we have met with several times. After meeting and learning more about how we operate, they view us as complementary to what they are doing rather than someone overlapping with services they already provide. According to Kevin Kelly, a General Manager based in Seattle: "I enjoyed meeting you both and look forward to remaining in touch and seeing how Ridwell continues to grow!"

Derek Ruckman, a Vice President and Group Manager of the Pacific Northwest at Recology agreed with that sentiment: "It was a great pleasure meeting you. I know I do not speak for just myself when I say we are really excited about your business model. Let's set a time in the summer to reconnect."

Early users of Ridwell are very happy with what we are providing, with many commenting how we are filling a need that had yet to be met prior to our arrival. Monique V. of Seattle said, "I have been waiting for something like this service for a long time – it feels like even with the city's recycling program there are still a lot of things that get put in the garbage that could be put to some good use!" Another customer, Eve (also of Seattle), described us as "A needed service in Seattle! Inexpensive and reliable, too."

We are committed to offering our service in a safe, reliable, and low-cost way and are pleased that we have demonstrated that to be the case. We have yet to miss a pickup, have had no safety issues, and customers like Eve are often commenting how affordable our service is for people across many different socioeconomic circumstances.

Please let us know what other information we can provide your organization. Written communication is often not the most efficient way of doing that, so I would be happy to visit Olympia and have conversations in person. Besides physical mail, I can also be reached by telephone at 206-920-8106 or by e-mail at ryan@ridwell.com.

Sincerely,



Ryan Metzger
CEO and co-founder, Ridwell

Attachment M

McPherson, Kathryn (UTC)

From: LaRue, Ann (UTC)
Sent: Thursday, May 23, 2019 10:37 AM
To: McPherson, Kathryn (UTC)
Subject: FW: Ridwell

Here is the email. I'll let Dawn Marie know that I forwarded it to you.

Thanks,

Ann

360.664.1245

From: Maurer, Dawn (ECY)
Sent: Wednesday, May 22, 2019 2:42 PM
To: LaRue, Ann (UTC) <ann.larue@utc.wa.gov>; Young, Mike (UTC) <mike.young@utc.wa.gov>
Subject: Ridwell

Who can I contact about the status of Ridwell? I understand the case was sent to investigations? There are still some outstanding solid waste handling issues we're looking into.



Dawn Marie Maurer

Solid Waste Facilities Specialist
Department of Ecology
Northwest Regional Office
425 649 7192

Attachment N

Compliance Activities - Telephone call from Ryan Metzger

Page 1 of 2

SharePoint Newsfeed OneDrive Sites McPherson, Kathryn (UTC)  

Activity Date 7/12/2019 2:37 PM

Title Telephone call from Ryan Metzger

Activity Status Complete

Activity Due Date

Activity Type

Activity Mode

Activity Contact Name

Activity Contact Email

Activity Contact Phone

Activity Contact Address

Activity Contact Location

Desc Mr. Metzger returned my call to discuss the compliance investigation on his company, Ridwell, Inc. I reviewed staff position that the company is in violation of providing residential recycling within the city of Seattle. I explained my response to him was in delay because I needed to verify with the city of Seattle that Ridwell, Inc. was not under city contract. Mr. Metzger argued his counsel stated that he was not required to have a certificate to transport, as the company was not under our jurisdiction. I explained that the city of Seattle has a contract with two companies, Recology and Waste Management, any other companies fall into UTC jurisdiction. I explained to Mr. Metzger that he must cease all recyclable services until such time that he applies for a certificate, and it is approved. I discussed that if he applies, the tariffed companies in that area have the right to protest. I encouraged Mr. Metzger to apply, as he states he has a working relationship with Recology. I provided Mr. Metzger with technical assistance on finding the application and licensing info on UTC.WA.GOV. Mr. Metzger stated he would review the application information. I did tell Mr. Metzger that the G-Certificate is separate from the requirements set by Ecology and Department of Health.

UTC Staff Members McPherson, Kathryn (UTC)

InvestigationItemSPID 2,174

Activity Document Count 0

Is Reportable No

Investigation ID

Content Type: ComplianceInvestigationActivity

<https://apps.utc.wa.gov/apps/investigations/Lists/Compliance%20Activities/DispForm.aspx...> 2/5/2020

Attachment O

Meeting between regulatory agencies and Ridwell, July 24, 2019

Room 119, Chinook Building

Attendees: Kathryn McPherson, Utilities and Transportation Commission (UTC);

Ryan Metzger, Aliya Marder, Connor Bronston, Ridwell;

Dawn Marie Maurer, Washington Dept. of Ecology (Ecology);

Hans Van Dusen, Seattle Public Utilities (SPU);

Rory O'Rourke and Yolanda Pon, Public Health – Seattle & King County (PHSKC)

Residential customers throughout the area have bins

Source-separated by customers

Weather-proof bin with a close-tight lid

Ridwell employees collect draw-string canvas bags with source-separated recyclables within bin.

Canvas bags are collected in passenger vehicles.

CFL bulbs are also loose packed.

Warehouse located at 312 W. Republican St., Queen Anne neighborhood of Seattle

Textiles- Goodwill

Plastic film- StyroRecycle pick-up at Ridwell's warehouse

Batteries- All City Battery, 1 Green Planet pick-up at Ridwell's warehouse

CFL bulbs- transported in Ridwell's vehicles to Ecolights in S. Seattle

- Cargo vans in sealed boxes

Non-profit partners:

Mary's Place, NW Lions Eyeglass Center, other non-profits, Ridwell will bring to them.

Something Sarvy Wildlife bedding, linens and towels for abandoned young wildlife.

Bras for another non-profit.

Only if common carrier permit required, other clothing and items reused as-is is not a solid waste

CFL bulbs, batteries, plastic film, Styrofoam - regulated solid waste

Common carrier- any person who undertakes or transports property for compensation regular or irregular routes; personal vehicle qualifies by definition, puts you under motor vehicle carrier requirements. Medical cert., commercial insurance for company

Rory O'Rourke
July 30, 2019

Solid Waste Handling Facility permit under Material Recovery Facility or Recycling Center for warehouse needs permit or may qualify for permit exemption. Need to check with Seattle Department of Construction and Inspection (SDCI) to determine if the use where the warehouse is located is allowed under the Seattle building code.

Ridwell currently is only operating in city of Seattle, but may expand into other areas.

A couple streams that are household hazardous waste have more stringent regulation due to increased health and environmental hazards.

Exemption from dangerous waste regulations for materials generated in household.

List of action items:

1. SPU – check with Hans VanDusen to see if City of Seattle will take jurisdiction of securing contracted area. If not, then see action item, #2.

2. UTC- Common carrier application required due to residential collection; safety regulations every 4 years

If Seattle chooses not to take jurisdiction, then Ridwell will need to apply for Solid Waste Certificate with UTC, any company regulated in area has right to protest

Establish a tariff if you expand outside city of Seattle, go before Commissioners

Need to go to Ecology if hauling for commercial businesses

If expanding residential service to Kent, Kirkland, or Bellevue, then King County request for G certificate

3. Ecology - Dawn Marie to check-in about extent of household hazardous waste exemption with Hazardous Waste program at Ecology.

4. PHSKC – permit or permit exemption for material recovery facility/ recycling center

PHSKC vehicle permit: \$500 base fee, \$30/vehicle/year

<https://www.kingcounty.gov/depts/health/environmental-health/toxins-air-quality/~media/depts/health/environmental-health/documents/toxins/solid-waste-permit-application.ashx>

If Ecology determines the waste being handled is not hazardous waste, then it would be considered moderate risk waste and can apply for Notice of Intent form if customers are only Small Quantity Generators and Household Hazardous Waste:

<https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070493.html>

1 form to Ecology, 1 form to PHSKC

Initial Application Fee: \$739.20, 4 hours of review included, \$184.80/hour thereafter

Rory O'Rourke
July 30, 2019

Commented [YP1]: Need clarification on which agency requires and issues G certificate. It's not PH.

Commented [O2R1]: I believe this is how Kathryn described what would be acquired through UTC, but Kathryn can provide additional clarification.

Source –separated recyclables exemption WAC 173-350-210 (2) Table 210-A (3):
<https://apps.leg.wa.gov/WAC/default.aspx?cite=173-350-210>

Annual reporting requirements

Open to inspection at reasonable times

Limited MRW facility exemption WAC 173-350-360 (2) Table 360-A –
<https://apps.leg.wa.gov/WAC/default.aspx?cite=173-350-360>

Rory O'Rourke
July 30, 2019

Attachment P



Kelley Jurgensen <kkplay1221@gmail.com>

You can now sign up for Ridwell in Kirkland!

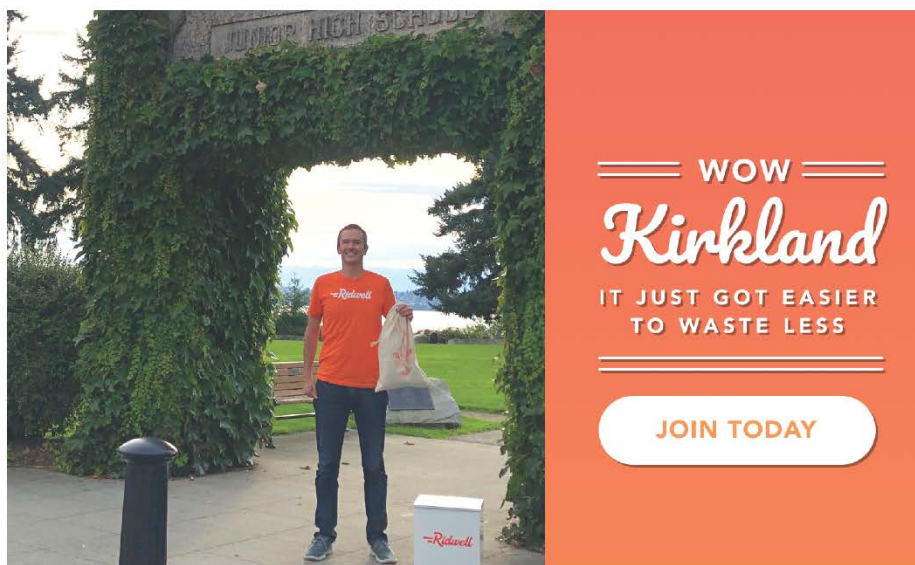
1 message

Ridwell <ridwell@email.ridwell.com>
Reply-To: help@ridwell.com
To: kelley <kkplay1221@gmail.com>

Mon, Sep 23, 2019 at 3:00 PM



Wasting less, made easy.



Ridwell is finally coming to Kirkland!

Kirkland has done an amazing job wasting less. We did two free pickups in your neighborhood and you guys saved over 180 pounds of threads and 2 car loads of plastic film!

We can't wait to bring the full Ridwell experience to you:

- Pickups every two weeks of plastic film, threads, batteries, and light bulbs
- A featured special category every pickup like Kitchenware, Halloween Candy, or electronics

- Additional add-on categories like Styrofoam and latex paint

"I am ridiculously excited about your services! Ridwell makes all my good intentions to reduce my carbon footprint streamlined and easy. I am just so grateful that you have started this service period and everyone should be a part of it."

-Laurnyn, Kirkland

Our first pickup will be on October 8th!

Sign up by October 4th to get in on the fun.

Get started today!



Still have questions about Ridwell?

If you still have questions about how Ridwell works, checkout our FAQ page or just respond to this email and we will get back to you!

Otherwise, why not start living a less wasteful life today?

[Too many emails? Unsubscribe here!](#)

Copyright © 2019, Ridwell Inc.
PO Box 19737 Seattle, WA 98109

Attachment Q

McPherson, Kathryn (UTC)

From: McPherson, Kathryn (UTC)
Sent: Monday, September 16, 2019 9:40 AM
To: VanDusen, Hans
Subject: RE: Ridwell Meeting 7.24.2019 Notes Review

Hans,

Has the city of Seattle given a contract for Ridwell to transport residential recycling to date? Are they in the process of receiving a contract with the city of Seattle to transport residential recycling?

Kathy

From: VanDusen, Hans [mailto:Hans.VanDusen@seattle.gov]
Sent: Friday, September 13, 2019 6:40 AM
To: Pon, Yolanda
Cc: McPherson, Kathryn (UTC) ; O'Rourke, Rory ; Maurer, Dawn (ECY)
Subject: Re: Ridwell Meeting 7.24.2019 Notes Review

And no new status with Seattle Public Utilities. Thanks.

Hans Van Dusen
Solid Waste Contracts Manager
Seattle Public Utilities
(206) 684-4657

On Sep 12, 2019, at 6:13 PM, Pon, Yolanda <Yolanda.Pon@kingcounty.gov> wrote:

CAUTION: External Email

Hi Kathryn. I know a Notice of Intent was submitted and payment was received on 8/19/19. Rory has been on vacation the past two weeks and will return on Monday and he will update you more on their status. Please give him until the end of next week to catch up on his e-mails. Thank you.

Yolanda Pon

Solid Waste Program Supervisor
Solid Waste, Rodent and Zoonotics Program
Environmental Health Services Division
Public Health – Seattle King County
401 5th Avenue, Suite 1100
Seattle, WA 98104
Phone: (206) 263-8459
Office hours: Tuesday - Friday

From: McPherson, Kathryn (UTC) [mailto:kathryn.mcpherson@utc.wa.gov]
Sent: Thursday, September 12, 2019 10:02 AM
To: O'Rourke, Rory <Rory.O'Rourke@kingcounty.gov>; Maurer, Dawn (ECY) <dmou461@ECY.WA.GOV>; VanDusen, Hans <Hans.VanDusen@seattle.gov>

Attachment R

McPherson, Kathryn (UTC)

From: VanDusen, Hans <Hans.VanDusen@seattle.gov>
Sent: Thursday, September 19, 2019 2:20 PM
To: McPherson, Kathryn (UTC)
Subject: RE: Ridwell Meeting 7.24.2019 Notes Review

Kathy – We have not taken any action to date. And nothing is currently in process. I'll check on our status. Thanks.



Hans Van Dusen
Solid Waste Contracts Manager
City of Seattle, Seattle Public Utilities
O: 206-684-4657 | M: 206-310-0341

[Facebook](#) | [Twitter](#)

From: McPherson, Kathryn (UTC)
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CAUTION: External Email

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Kathy

From: VanDusen, Hans [<mailto:Hans.VanDusen@seattle.gov>]
Sent: Friday, September 13, 2019 6:40 AM
To: Pon, Yolanda <Yolanda.Pon@kingcounty.gov>
Cc: McPherson, Kathryn (UTC) <kathryn.mcpherson@utc.wa.gov>; O'Rourke, Rory ; Maurer, Dawn (ECY) <dmau461@ECY.WA.GOV>
Subject: Re: Ridwell Meeting 7.24.2019 Notes Review

And no new status with Seattle Public Utilities. Thanks.

Hans Van Dusen
Solid Waste Contracts Manager
Seattle Public Utilities
(206) 684-4657

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Hi Kathryn. I know a Notice of Intent was submitted and payment was received on 8/19/19. Rory has been on vacation the past two weeks and will return on Monday and he will update you more on their status. Please give him until the end of next week to catch up on his e-mails. Thank you.

Attachment S

McPherson, Kathryn (UTC)

From: O'Rourke, Rory <Rory.O'Rourke@kingcounty.gov>
Sent: Wednesday, September 25, 2019 3:21 PM
To: Ryan Metzger
Cc: McPherson, Kathryn (UTC); VanDusen, Hans; Pon, Yolanda; Jessen, Jennifer
Subject: Ridwell Notice of Intent Review and Facility Inspection

Hi Ryan,

Hope you are doing well. I have had the opportunity to review your Notice of Intent to Operate application and have some comments for revising some sections. I have included these bulleted items below. In addition, as part of our standard review, we would like to set up a time to come inspect your facility. I will be coming along with my colleague, Jennifer Jessen, who is our exempt facility lead.

- On your Notice of Intent to Operate Part 2, Type of Exemption, please check the "Recycling or material recovery of source-separated recyclable materials WAC 173-350-210 Table 210-A(3)" not the one currently checked that has brick, cured concrete, or asphaltic materials.
- Please provide documentation from the Seattle Department of Construction and Inspections detailing the zoning code and whether a recycling or material recovery facility is an acceptable use at your facility location.
- As of September 24, 2019, your website shows that Ridwell has started collecting additional waste streams such as latex paint, electronics, car seats, and wine corks. Your application will need to be updated throughout to reflect these changes. For future reference, we require 30 days' notice for adding new waste streams, otherwise you may be subject for solid waste handling permitting requirements.
- Collecting used wine corks can attract rodents and insects. We will need to describe in more detail how you plan to control vectors so they are not attracted to this waste stream.
- MRW mobile system response #3 only indicates that you plan to pick up from neighborhoods throughout Seattle, however, it has come to our attention you have started collecting in Kirkland as well. This should be updated to include the areas that you plan to service.
- In relation to the previous bullet, you will need to apply for a contract for Kirkland through City of Kirkland or a G-certificate for King County through Washington Utilities and Transportation Commission if Kirkland decides not to pursue the contract. This will be needed to comply with WAC 173-350-040, "Performance standards." Please contact Kathryn McPherson (cced here) for additional details. Hans VanDusen (also cced here) will be determining the City of Seattle component.
- The MRW mobile system responses need to be updated throughout to include description of handling electronics/ e-waste. Please find this as a resource for additional guidance on handling e-waste: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Electronic-waste>
- MRW mobile system #7 should provide more detail of procedures on how you will contain a spill in one of your vehicles and at the facility.

Please feel free to reach out to me if you have any questions about these items. We look forward to hearing from you on times to set up an appointment to visit your facility. Thanks!

Attachment T

McPherson, Kathryn (UTC)

From: John MacGillivray <JMacGillivray@kirklandwa.gov>
Sent: Tuesday, October 8, 2019 1:27 PM
To: McPherson, Kathryn (UTC)
Subject: RE: Ridwell, Inc. - Residential Recycling Compliance Inquiry

Kathyrn,

Ridwell has not contacted the City of Kirkland as far as I know. Our hauling contract is specific in providing Waste Management with the exclusive right to collect garbage from residential and commercial customers and recycling from residential customers. As you probably know, commercial recycling is free market so a business could elect to have recycling services provided by another vendor. However, it appears that Ridwell's business model is specific to batteries, light bulbs, plastic film, and textiles. That being the case, Kirkland would not have any issues with them operating in our City collecting the those specific items that Waste Management does not have the exclusive right to collect.

Sincerely,

John MacGillivray
Solid Waste Programs Supervisor
City of Kirkland
(425) 587-3804

From: McPherson, Kathryn (UTC)
Sent: Tuesday, October 08, 2019 12:50 PM
To: John MacGillivray
Subject: Ridwell, Inc. - Residential Recycling Compliance Inquiry

Good day, Mr. MacGillivray.

I have been working on compliance with Ridwell, Inc. They are a residential recycling business, start-up model. The company was working exclusively within the city of Seattle. They offer pick up of recyclable good, and other reusable/re-dispersible items for home pick up at a nominal reoccurring charge. Please see their website at <https://www.ridwell.com/> As of October, 2019, Ridwell plans to collect recyclables from Kirkland.

A history of activities:

I learned of Ridwell from a referral by Department of Ecology. The commission sent the company a technical assistance letter May, 2019. A few months ago, Ridwell met with myself from the Utilities and Transportation Commission, Dawn Marie Maurer from Ecology, Rory O'Rourke and Yolonda Pon with King County Public Health, Hans VanDusen Contract Manager for City of Seattle Solid Waste. At that time, the city of Seattle was unsure if they believed Ridwell required a certificate to offer curbside assistance, as Recology has a contract with the city. Ecology and Public Health have been working with the company to provide the required facility permits.

Recently, communication with the city of Seattle has informed me that they have no plans to pursue jurisdiction with the company, as it does not interfere with Recology's service or its consumer base to provide residential recycling with their curbside garbage services. As this is the case, the commission would take jurisdiction to determine if the company

is required to apply for a certificate of convenience to collect and transport residential recycling based on RCW 81.70-040. This is particularly more relevant now that the company service area includes outside of the city of Seattle into your contract city area of Kirkland.

To your knowledge, has Ridwell made any attempts to contact the city of Kirkland Solid Waste program for permit or contract requirements? If so, can you elaborate? I would like to know what steps they have taken to comply with local and state laws.

Thank you,

Kathryn McPherson
Investigator, Solid Waste Enforcement
Transportation Safety Division
(360) 664-1108 Office
Kathryn.Mcpherson@utc.wa.gov
www.utc.wa.gov



This email/letter states the informal opinions of commission staff, offered as technical assistance, and are not intended as legal advice. We reserve the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff's opinions are not binding on the commission.

NOTICE: This e-mail account is part of the public domain. Any correspondence and attachments, including personal information, sent to and from the City of Kirkland are subject to the Washington State Public Records Act, Chapter 42.56 RCW, and may be subject to disclosure to a third party requestor, regardless of any claim of confidentiality or privilege asserted by an external party.

Attachment U

10/8/2019

City of Kirkland - Single Family Recycle Collection Service



Electronics

- ✓ next to your cart
- ✓ drop off



Batteries

- ✓ drop off



Styrofoam

- ✓ special events



Plastic Bags

- ✓ drop off



Clothing and Shoes

- ✓ next to your cart
- ✓ drop off



Latex Paint

- ✓ drop off (fee)



CFL Bulbs and Fluorescent Tubes

- ✓ drop off



Used Cooking Oil

- ✓ drop off



Motor Oil

- ✓ next to your cart →
- ✓ drop off →



Large Appliances and Bulky Items

- ✓ curbside (fee) →
- ✓ drop off →

Recycling Collection Events

Twice a year (Spring and Fall), we hold a Special Recycling Collection Event for residents to bring in recyclable materials that are not collected curbside, such as tires, appliances, mattresses and toilets.

Why should I recycle?

- Recycle to save money. By putting recyclables in your blue cart, you generate less trash. With less trash, you can opt for a smaller (and cheaper) garbage service level.
- Recycling helps the environment because items are made into new things instead of sitting unused in the [landfill](#) for a lifetime.
- Our landfill is on pace to fill up in ten years, and once it's full we'll need to either ship our waste somewhere else or build a waste-to-energy facility that harvests energy from burning trash. These options will likely cost more than using our current landfill, which would make your rates increase.

https://www.kirklandwa.gov/depart/Public_Works/solidwaste/singlefamily/Recycle.htm?

48

Attachment V



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

October 22, 2019

Ryan Metzger
Aliya Marder
Ridwell, Inc.
415 1st Avenue N, Unit 19737
Seattle, WA 98103

Dear Mr. Metzger and Ms. Marder,

I contacted the cities of Seattle and Kirkland solid waste programs regarding Ridwell, Inc.'s (Ridwell) business. Representatives from both cities informed me they do not intend to enter into a contract to transport solid waste or recyclable materials with Ridwell at this time. Companies not contracting with a city to provide solid waste services must comply with the requirements of Revised Code of Washington (RCW) 81.77 and obtain a solid waste certificate from the commission prior to operating as a solid waste company.

King County's Solid Waste Management plan lists recyclables Ridwell collects residentially. In the absence of a contract with a city, Ridwell cannot collect residential recyclables without a solid waste certificate from the commission.

In its October 7, 2019, letter to King County, Environmental Health Services Division, Ridwell states,

... Just as junk hauling services are exempt from G-certificates because their operations are different from curbside service, we believe ours may be too. We do not pick up categories covered by city services and customers opt-in when they would like a pickup that happens from their doorstep instead of the curb. We are in the process of setting up time to state this case to the UTC in a meeting coordinated by our State Senator ..."

RCW 81.77.010(9), and Washington Administrative Code (WAC) 480-70-041 provide definitions of "solid waste" and "residential recycling services."

RCW 81.77.040 authorizes the commission to adopt categories of solid wastes as follows: Garbage, refuse, recyclable materials, and demolition debris. Further, a certificate may be issued for one or more categories of solid waste.

Respect. Professionalism. Integrity. Accountability.

October 22, 2019

Ryan Metzger

Aliya Marder

Page 2

Batteries, lightbulbs, and Styrofoam are included in Seattle and Kirkland's solid waste plans. Each require drop-off at a transfer station for recycling. Ridwell's application with King County lists the company address 312 W Republican Street, Seattle, Washington 98119. The application also lists this location as a recycling and material recovery facility of source separated material.

Without a solid waste certificate from the commission to haul solid waste or recycling in Washington state, Ridwell, Inc., may not advertise or provide these services. Until and unless the commission grants a solid waste certificate, Ridwell, Inc., must immediately cease providing all forms of solid waste advertising and collection services.

If you wish to offer solid waste collection services, including residential recycling, you must first apply for authority as a solid waste collection company. Be advised, however, that your application (attached) is subject to a public protest period and your company will have to demonstrate that the existing solid waste company is not providing the service Ridwell proposes to offer. The commission will only grant new solid waste authority if the existing certificated company is determined to be unfit, unwilling, or unable to provide the service.

To avoid enforcement action by the commission, by November 4, 2019, please either submit a complete application for a solid waste certificate, or explain in writing why you believe your business does not require authority from the commission.

Please direct your written response, to Kathryn.McPherson@utc.wa.gov or by US Mail to PO Box 47250, Olympia, WA 98504. You may also reach Ms. McPherson at (360) 664-1108.

Sincerely,

/s/ Mathew Perkinson

MATHEW PERKINSON

Assistant Director, Transportation Safety

Enclosures (1)

Attachment W

McPherson, Kathryn (UTC)

From: Ryan Metzger <ryan@ridwell.com>
Sent: Monday, November 4, 2019 2:18 PM
To: McPherson, Kathryn (UTC)
Cc: Perkinson, Mathew (UTC)
Subject: Ridwell's response to your most recent inquiry

Dear Ms. McPherson and Mr. Perkinson,

I am writing to let you know that a written response to your most recent inquiry is on its way via USPS and should arrive tomorrow. We look forward to hearing your thoughts once you receive it as well as finding a time for an in-person meeting related to a separate email thread that has been circulating after we were connected several weeks ago to Jon Noski.

Sincerely,
Ryan Metzger

Attachment X

McPherson, Kathryn (UTC)

From: McPherson, Kathryn (UTC)
Sent: Wednesday, November 6, 2019 12:16 PM
To: Ryan Metzger
Subject: RE: Ridwell's response to your most recent inquiry

Importance: High

Good day, Mr. Metzger.

At this time I have not received a reply to the compliance letter sent to Ridwell, Inc. October 22, 2019. A response was due no later than November 4, 2019. Please forward a copy of the letter sent via USPS by email to me directly.

Thank you,

Kathryn McPherson
Investigator, Solid Waste Enforcement
Transportation Safety Division
(360) 664-1108 Office
Kathryn.Mcpherson@utc.wa.gov
www.utc.wa.gov

From: Ryan Metzger [mailto:ryan@ridwell.com]
Sent: Monday, November 4, 2019 2:18 PM
To: McPherson, Kathryn (UTC)
Cc: Perkinson, Mathew (UTC)
Subject: Ridwell's response to your most recent inquiry

Dear Ms. McPherson and Mr. Perkinson,

I am writing to let you know that a written response to your most recent inquiry is on its way via USPS and should arrive tomorrow. We look forward to hearing your thoughts once you receive it as well as finding a time for an in-person meeting related to a separate email thread that has been circulating after we were connected several weeks ago to Jon Noski.

Sincerely,
Ryan Metzger

Attachment Y

McPherson, Kathryn (UTC)

From: Ryan Metzger <ryan@ridwell.com>
Sent: Wednesday, November 6, 2019 2:33 PM
To: McPherson, Kathryn (UTC)
Subject: Re: Ridwell's response to your most recent inquiry
Attachments: usps_tracking.JPG

Hello Ms. McPherson,

I show that our letter was delivered yesterday, November 5th after it was postmarked on your deadline of November 4th. Please see attached for the screenshot. Has it still not arrived? Let me know if it has not and I can try to send a digital copy as well.

Ryan

On Wed, Nov 6, 2019 at 12:15 PM McPherson, Kathryn (UTC) <kathryn.mcpherson@utc.wa.gov> wrote:

Good day, Mr. Metzger.

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Thank you,

Kathryn McPherson

Investigator, Solid Waste Enforcement

Transportation Safety Division

(360) 664-1108 Office

Kathryn.Mcpherson@utc.wa.gov
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Sent: Monday, November 4, 2019 2:18 PM
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Cc: Perkinson, Mathew (UTC) <mathew.perkinson@utc.wa.gov>
Subject: Ridwell's response to your most recent inquiry

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Sincerely,

Ryan Metzger

Attachment Z

McPherson, Kathryn (UTC)

From: Ryan Metzger <ryan@ridwell.com>
Sent: Wednesday, November 6, 2019 2:33 PM
To: McPherson, Kathryn (UTC)
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Attachments: usps_tracking.JPG

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Thank you,

Kathryn McPherson

Investigator, Solid Waste Enforcement

Transportation Safety Division

(360) 664-1108 Office

Kathryn.Mcperson@utc.wa.gov
www.utc.wa.gov

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Sent: Monday, November 4, 2019 2:18 PM
To: McPherson, Kathryn (UTC) <kathryn.mcperson@utc.wa.gov>
Cc: Perkinson, Mathew (UTC) <mathew.perkinson@utc.wa.gov>
Subject: Ridwell's response to your most recent inquiry

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Sincerely,

Ryan Metzger



P.O. Box 19737 Seattle, WA 98109

November 4, 2019

Kathryn McPherson
P.O. Box 47250
Olympia, WA 98504

Dear Ms. McPherson,

We are responding to letters dated October 18th and 22nd which we received from Mathew Perkinson. We are also in the process of scheduling time to meet with Mr. Perkinson along with Jon Noski and Jason Lewis of the UTC after a connection was made by Senator Reuven Carlyle's office. We look forward to that meeting as another opportunity to cooperate with your organization – just as we have done by previously scheduling and completing an inspection of our facility by the King County Department of Public Health. We hope to discuss how we are different from a solid waste collection company and why we believe our business does not require authority from the commission.

Why is Ridwell different than traditional g-certificate holders?

Since we first began having conversations with the commission, we have been looking into the companies that hold G-certificates. Unlike those solid waste haulers, our service:

- Does not take anything to MRFs, transfer stations, or landfills
- Is paid for voluntarily by a subset of a city's residents
- Does not feature pickup from curbside locations or dumpsters
- Utilizes passenger vehicles for transportation
- Features a pickup when a customer requests one rather than on a regularly scheduled cadence
- Does not pick up categories identified as recyclable through city-contracted haulers where we operate
- Sends most of its categories to be reused by local non-profit partners

The closest comparison to what we do is the sanctioned drop-off locations for categories that exist beyond city and county-provided services. Rather than consumers driving their items to Goodwill, Recology stores, etc., we save them that trip and take their things on their behalf to processors and non-profit donation partners.

Many of our customers mention how our service saves them trips they would otherwise take on their own:

“Ridwell accomplishes in a single pick-up what I endeavored to do in multiple around-town trips. Keeping more recyclable and reusable stuffs out of the landfill is important to me; doing it efficiently and environmentally consciously is of greater urgency to me.” – Erin, Seattle

Through Ridwell taking these trips instead of individual customers, we are reducing miles traveled, avoiding wear and tear on our roads and highways, and lessening the carbon footprint of Washington state.

Some residents of Washington state face mobility challenges and are not able to take these trips on their own. By telling customers with disabilities that their only option is to drive materials like plastic bags to grocery stores if they wish to recycle them, this may be a violation of the Americans with Disabilities Act, Title II that prevents discrimination in state and local government services. One customer with mobility issues was grateful that Ridwell exists since we remove barriers they face to access additional recycling and reuse services that are more readily available to others in Washington State:

“I have already recommended Ridwell to friends and neighbors; it solves recycling problems for people who care about this topic but (like me) have mobility issues that Ridwell solves by removing the barriers of seeking out the specialized drop off locations.” – Susan, Seattle

How our categories differ from solid waste haulers

We would like to share more about the categories that we collect since it provides important information on how we differ from solid waste haulers. On a UTC-provided ‘Collecting and Transporting Garbage and Recycling’ flyer (that we have provided in Appendix I), there is a definition for ‘what is garbage’ that states it includes ‘source separated recyclable material collected from residents.’ Next, that term is defined as ‘waste separated for reuse that is identified as recyclable by local city or county authorities.’

Since over 90% of our customers are in Seattle, we will look to the Seattle Public Utilities ‘Where does it go’ flyer (that I have included in Appendix II) to determine what is and is not identified as recyclable. In that file, you will see (hard) plastics, paper, cardboard, glass bottles & jars and metal identified as recyclable. Ridwell does not and will not be collecting any of those categories. In Seattle, those categories are picked up from residents by Waste Management and Recology and it is important to know that both are aware of Ridwell and have told us they are glad we exist since we are not overlapping with what they do. Therefore, our service does not compete with existing certified haulers and we are not collecting anything categorized as solid waste according to the definition on UTC-provided material.

Our place relative to city services is another aspect that is often mentioned by our customers:

“Love that Ridwell “fills the gap” that City recycling services creates. Especially like the plastic film collection.” – Nancy, Seattle

To further illustrate how we differ from solid waste haulers, we have prepared the following table of our categories that have been featured in 2019 and list whether each is found in the City of Seattle ‘where does it go’ flyer under the recycling category. We have also listed whether our categories are eventually recycled or reused, and you will see that a majority are taken to be reused by non-profit partners. We believe that this focus on reuse and our recycling of materials considered non-recyclable by cities makes us most similar to services like NW Center or Goodwill pick up some of the categories we do and are not classified as solid waste collection companies.

Material	Identified as Recyclable?	Re-used (i.e., take to non-profit donation facility)	Delivered to Entity that will Recycle/Reprocess
Back to School backpacks, alarm clocks, and calculators	N	X	
Non-perishable food	N	X	
Eyeglasses	N	X	
Books	N	X	
Hats, Scarfs, Gloves	N	X	
Halloween candy	N	X	
Pajamas	N	X	
Women’s Dress Clothes	N	X	
Travel size toiletries	N	X	
Stuffed Animals	N	X	
Legos	N	X	
Dolls and Action Figures	N	X	
Food takeout utensils	N	X	
Jewelry	N	X	
Loose and unused diapers	N	X	
Small kitchenware	N	X	
Metal Bottle Caps and Pouch Tops	N	X	
Pet supplies and pet toys	N	X	
Bras	N	X	
Bedding, linens, and towels	N	X	
Planter pots	N	X	
Wine Corks*	N	X	X
Styrofoam peanuts*	N	X	X
Clothing/Shoes*	N	X	X
Car seats*	N	X	X
Plastic Film	N		X
Household batteries	N		X

Light bulbs	N		X
Small electronics	N		X
Old ID and gift cards	N		X
Styrofoam	N		X
Latex Paint	N		X

*Note: these categories are reused if possible and recycled if not. Determination is most often made by our partners based on the condition of each item they receive from us.

A history of cooperation

As you may know, we have been cooperating with the Seattle and King County Department of Public Health where we are working towards a permit exemption for our facility and our operating procedures. An inspection was held at our facility on Tuesday, October 8th where Rory O'Rourke of that department was able to see how we operated and how different our setup is from a MRF or transfer station. This is one example of many where we have been a responsive partner to government agencies. You will see a timeline of our interactions in Appendix III at the conclusion of this letter.

We know that the Utilities and Transportation Commission has a mission to make sure investor-owned utility and transportation services are safe, available, reliable and fairly-priced. We applaud that mission and our proud of our own record that shows no safety incidents, no missed pickups, and a price that many customers have stated is a great value:

"I really appreciate having an easy and affordable way to do the right thing!" – Lisa, Seattle

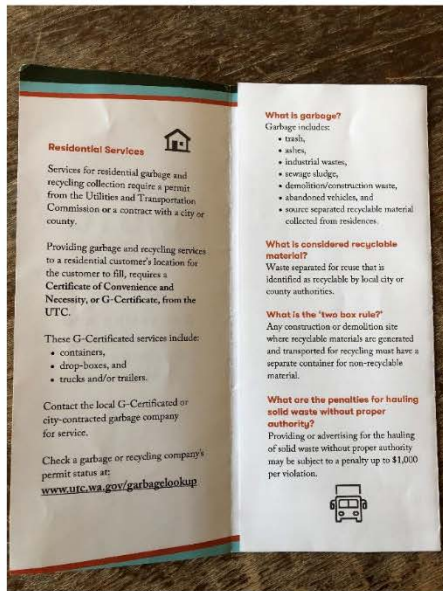
Through our research, we know that some categories of businesses, like junk haulers, could be considered solid waste collection companies but have been determined to be a different category. We believe Ridwell to be even further from a solid waste company and look forward to having open-minded and collaborative discussions with your organization.

Sincerely,

Ryan Metzger

Ryan Metzger
CEO and co-founder, Ridwell

Appendix I – UTC Flyer



Appendix II – City of Seattle ‘Where does it go’ flyer (as of November 1, 2019)

 Food & Compost	 Recycle	 Garbage
<p>All Food Waste, Food-Soiled Paper* & Shredded Paper</p>  <p><small>*hardcover library coating</small></p>	<p>ALL RECYCLABLES SHOULD BE EMPTY, CLEAN & DRY</p> <p>Plastics</p>  <p><small>(empty plastic bottles — no loose liquid)</small> <small>(plastic lids must be 2 inches or under in size or narrower)</small></p>	<p>Non-Recyclable Plastic & Paper</p>  <p><small>(plastic food bags & wrap)</small> <small>(plastic stickers)</small> <small>(plastic utensils & straws)</small> <small>(small plastic containers 2 inches or less)</small> <small>(empty milk cartons)</small></p>
<p>Approved Compostable Packaging & Bags</p>  <p><small>(Bare foam mail boxes)</small></p>	<p>Paper</p>  <p><small>(hardcover plastic-coated allowed)</small></p> <p>Cardboard</p>  <p><small>(hardcover plastic-coated allowed)</small></p>	<p>Foam Trays & Containers</p>  <p><small>(styrofoam trays & containers)</small></p> <p>Kitchen Grease</p>  <p><small>CAN IT, COOK IT, TRASH IT.</small></p>
<p>Yard Waste, Plants, Untreated Wood</p>  <p><small>(Less than 4 feet long and 4 inches thick)</small></p>	<p>Glass Bottles & Jars</p>  <p>Metal</p> 	<p>Non-Recyclable Materials</p>  <p><small>(Styrofoam)</small> <small>(plastic)</small> <small>(metal, cans & food items more than 2 inches wide)</small> <small>(food-soiled foil)</small> <small>(fragile packing materials)</small> <small>(bags)</small> <small>(shipped out waste)</small> <small>(empty cans & dried paint)</small></p>
<p>NO</p> <ul style="list-style-type: none"> Plastic Bags Plastic Tape Stickers Glass Metal Animal Waste Rocks 	<p>NO</p> <ul style="list-style-type: none"> Food Liquid Single Plastic Bags 	<p>NO</p> <ul style="list-style-type: none"> Food Yard Waste Recyclables Hazardous Waste
<p>Where Does it Go? seattle.gov/utilities/wheredoesitgo (206) 684-3000</p>		

Appendix III - Timeline of Correspondence between Ridwell and government agencies, including the UTC

-May 3, 2019: Mike Turcott of the UTC sends physical mail to Ridwell to discuss regulatory status.

-May 14, 2019: Ridwell responds by physical mail to the UTC, outlining how our service operates and explaining that city-contracted haulers encourage our existence.

-July 12, 2019: Ryan Metzger of Ridwell and Kathryn McPherson of the UTC speak on the phone where they discuss in more detail how Ridwell operates.

-July 13, 2019: Kathryn McPherson from the UTC sends an email to Ryan Metzger of Ridwell with the subject line "Investigation closure." In that email she states that the UTC does not have jurisdiction over Ridwell at this time.

-July 24, 2019: Ridwell meets with Kathryn McPherson at the King County Department of Health, along with representatives from Public Health, Seattle Public Utilities, and Washington State Department of Ecology.

-August 1, 2019: King County Department of Public Health distributes meeting notes from the July 24 meeting and recommends that Ridwell submit an application for a permit exemption.

-August 13, 2019: Ryan Metzger of Ridwell and State Senator Reuven Carlyle meet in Seattle. Ryan shares the current regulatory status with regard to both the UTC and King County Department of Public Health.

-August 14, 2019: Ryan Metzger of Ridwell and Rory O'Rourke of King County Department of Public Health speak on the phone about some questions related to the permit exemption application.

-August 19, 2019: Ridwell submits hard and electronic copies, along with the application fee, for a permit exemption with King County Department of Public Health.

-September 25, 2019: King County Department of Public Health sends Ridwell an email with questions about the permit exemption application, suggested revisions to the application, and a request to schedule a site inspection.

-September 27, 2019: Ridwell responds to the Public Health request for an inspection with proposed dates for that to occur and mentions that they are in the process of revising the application and preparing answers to the questions posed.

-October 7, 2019: Ridwell sends an email to Department of Public Health with a revised application and answers to the questions they posed.

- October 8, 2019: King County Department of Public Health completes a site inspection of Ridwell's office as part of the permit exemption process.
- October 8, 2019: Ridwell emails King County Department of Public Health with a data request that was posed during the inspection earlier that day.
- October 9, 2019: King County Department of Health replies to the email from 10/8 and states "...this should be sufficient for our needs. I will follow up if I have any questions about this."
- October 18, 2019: Mathew Perkinson of the UTC sends a letter to Ridwell stating we need to file a complete application for a solid waste certificate or explain in writing why we believe our business does not require authority from the commission. A deadline is set for November 1, 2019.
- October 22, 2019: Josh Peck, the legislative assistant to State Senator Reuven Carlyle makes an introduction between Ryan Metzger of Ridwell and Jon Noski of the UTC stating that the Senator wishes they meet to discuss in person the regulatory status of Ridwell.
- October 22, 2019: Ryan Metzger of Ridwell replies to Josh Peck's email to Jon Noski and offers to travel to Olympia to meet with the UTC at a date and time of their choosing.
- October 23, 2019: Mathew Perkinson of the UTC sends a letter to Ridwell stating we need to file a complete application for a solid waste certificate or explain in writing why we believe our business does not require authority from the commission. A deadline is set for November 4, 2019. This letter appears to be nearly identical to the one dated October 22nd.
- October 30, 2019: Ryan Metzger of Ridwell sends an additional note to Jon Noski reminding him of the introduction that was made and again requests to meet in person to discuss Ridwell's regulatory status.
- October 30, 2019: Jon Noski of the UTC replies to Ryan Metzger's email saying he will work with the motor carrier division to find days and times that work for a meeting in the near future. Mathew Perkinson and Jason Lewis were added to the email by Jon Noski.
- November 4, 2019: Ridwell responds to the October 21 and 23 physical correspondence with this letter.

Attachment AA



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503
P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

Dec. 13, 2019

Ryan Metzger
Aliya Marder
Ridwell, Inc.
956 N 42nd St., Unit A
Seattle, WA 98103

RE: Response to Ridwell, Inc. Regarding Commission Solid Waste Regulations

Dear Mr. Metzger and Ms. Marder:

On Oct. 22, 2019, Washington Utilities and Transportation Commission (UTC or Commission) Staff (Staff) requested that Ridwell, Inc. (Ridwell) respond to a letter regarding its residential recycling program. On Nov. 4, 2019, Ridwell responded via letter informing Staff that the Commission should not consider Ridwell a residential recycling company because Ridwell's business model differs from traditional solid waste certificate holders.

In its letter Ridwell states it “. . . [d]oes not pick up categories identified as recyclable through city-contracted haulers where we operate. . .” However, Staff believes Ridwell is in fact collecting and offering to collect residential recyclable materials listed in the local comprehensive solid waste plans of the cities of Seattle and Kirkland. The City of Seattle offers specialty pickups of batteries, CFL lightbulbs, and Styrofoam. Kirkland lists these products as recyclable at certain drop-off locations.

Ridwell's letter states that it is not a residential recycling company because the company does not take anything to “. . . MRFs, transfer stations, or landfills . . .” Ridwell has a location for storage of recyclables to be distributed to other locations and is working with King County's Solid Waste Division for permit approval.

On Oct. 9, 2018, Ridwell established a solid waste facility. Ridwell's application for Notice of Intent to Operate under Terms and Conditions for Solid Waste Permit Exemption dated Oct. 7, 2019, designates the location as a recycling facility. In its application, Ridwell selected recycling or material recovery of source-separated recyclable material and moderate risk waste.

Respect. Professionalism. Integrity. Accountability.

Ryan Metzger
Aliya Marder
Ridwell, Inc.
Dec. 13, 2019
Page 2 of 3

Ridwell's letter mentions that the company utilizes passenger vehicles for transportation of the recyclable materials. The type of vehicle used to transport the waste or recyclable material has no bearing on the applicability of the Commission's solid waste certificate requirements.¹

Ridwell's website offers "... pickups every two weeks of plastic film, threads, batteries, and light bulbs. . ." from residences. Washington Administrative Code (WAC) 480-70-041 defines residential recycling service as collection of those solid wastes that are separated for recycling or reuse, such as paper, plastic, metals, and glass, that are identified as recyclable materials pursuant to a local comprehensive solid waste plan. Commission rules do not specify recyclables must be collected curbside, nor do Seattle or Kirkland's local comprehensive solid waste plans.

On Dec. 9, 2019, staff met with Ridwell at the Commission. Staff appreciates Ridwell's willingness to meet and further explain its business model and its on-going effort to gain regulatory clarity. During the meeting staff explained that it believes Ridwell is offering residential recycling services and outlined options for Ridwell to take into consideration going forward to avoid enforcement.

Staff believes Ridwell is engaging in services that require a solid waste certificate from the Commission. Ridwell must have a certificate of public convenience and necessity from the Commission before operating as a solid waste collection company in the state of Washington.² Without authority from the Commission to haul solid waste or recycling in Washington state, Ridwell may not advertise or provide these services. Until and unless the Commission grants a solid waste certificate, Ridwell must immediately cease advertising and providing all forms of solid waste collection services.

If Ridwell wishes to offer solid waste collection services, including residential recycling, it must first apply to the Commission for authority as a solid waste collection company. Ridwell must demonstrate that the existing solid waste company does not provide the service Ridwell proposes to offer. Each solid waste application is subject to public protest. The Commission only grants new solid waste authority if the existing certificated company is determined to be unfit, unwilling, or unable to provide the service.

The Commission may grant an exemption from, or modify the application of, any of its rules in individual circumstances if the exemption or modification is consistent with the public interest, the purposes underlying regulation, and applicable statutes.³ The process to request an exemption

¹ RCW 81.77.010(6) defines vehicle as "... every device capable of being moved upon a public highway and in, upon, or by which any solid waste is or may be transported or drawn upon a public highway . . ."

² WAC 480-70-081(1)

³ WAC 480-07-110(1)

Ryan Metzger
Aliya Marder
Ridwell, Inc.
Dec. 13, 2019
Page 3 of 3

is outlined in WAC 480-07-110(2). Ridwell may request for clarification the interpretation of any rule in WAC 480-70.⁴ Ridwell may also petition the Commission for a declaratory order.⁵

To avoid enforcement action by the Commission, by December 27, 2019, please submit a complete application for a solid waste certificate or cease all operations as a residential recycling company including advertising.

Please direct your written response to Kathryn.McPherson@utc.wa.gov or by mail to P.O. Box 47250, Olympia, WA 98504-7250. You may also reach Ms. McPherson at (360) 664-1108.

Sincerely,

/s/ Mathew Perkinson
MATHEW PERKINSON
Assistant Director, Transportation Safety

⁴ WAC 480-70-031

⁵ WAC 480-07-930

Attachment AB

McPherson, Kathryn (UTC)

From: Ryan Metzger <ryan@ridwell.com>
Sent: Tuesday, December 24, 2019 9:35 AM
To: McPherson, Kathryn (UTC); Perkinson, Mathew (UTC)
Subject: Re: Courtesy Email - Compliance letter Ridwell, Inc.
Attachments: ridwell_utc_Dec2019.pdf

Hi Kathryn and Mathew,

We have not yet received a physical copy of the notice you provided, but have prepared a response that I am attaching to this email. A physical copy has also been sent and is scheduled to arrive at your PO box on 12/26. We look forward to partnering with you further in the weeks ahead and hope you both have a great holiday season,

Ryan

On Fri, Dec 13, 2019 at 11:01 AM McPherson, Kathryn (UTC) <kathryn.mcpherson@utc.wa.gov> wrote:

The Washington Utilities and Transportation Commission sent the attached compliance letter via certified mail on December 13, 2019.

I attached a copy of the above document. If you have any questions, please contact me.

Thank you,

Kathryn McPherson

Investigator, Solid Waste Enforcement

Transportation Safety Division

(360) 664-1108 Office

Kathryn.Mcpherson@utc.wa.gov
www.utc.wa.gov