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OF COUNSEL

April 21, 1992

Mr. Paul Curl, Secretary
Washington Utilities and
Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Dr. SW
Mail Stop FY-11
Olympia, WA 98504

**Re: Kleenwell Biohazard
No. TG-920304**

Dear Mr. Curl:

Enclosed for filing in the above matter you will find an original
and three copies of Petition to Intervene.

Very truly yours,

McCLUSKEY, SELLS, RYAN,
HABERLY & UPTEGRAFT



JAMES K. SELLS

JKS:cs

Encls.

cc: Mr. J. P. Jones
Mr. Mike Torre
Ms. Cindy Vale
Mr. Dave Wiley

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining
the Proper Carrier Classifica-
tion of:

DOCKET NO. TG-920304

ENOCH ROWLAND, d/b/a KLEENWELL
BIOHAZARD AND GENERAL ECOLOGY
CONSULTANTS

PETITION TO INTERVENE

COMES NOW proposed Intervenor, Washington Waste Management Association, and petitions the Commission to intervene in the above-entitled matter, and in doing so states the following:

INTERVENOR: Washington Waste Management Association, Suite 204, 711 South Capitol Way, Olympia, WA 98507.

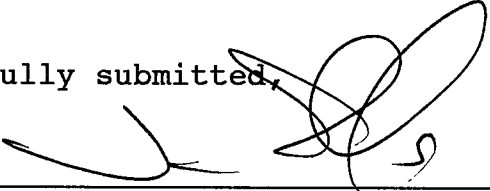
INTERVENOR'S ATTORNEY: James K. Sells, 510 Washington Ave., Suite 300, Bremerton, WA 98310.

INTERVENOR'S INTEREST IN PROCEEDING: Washington Waste Management Association is a non-profit corporation composed of holders of solid waste and recycling certificates in the State of Washington. Washington Waste Management Association has been an intervenor and/or protestant in numerous solid waste applications and enforcement proceedings before this Commission. Washington Waste Management Association was a protestant in Kleenwell Biohazard's previous application before this Commission, GA-907. Members of the Washington Waste Management Association transport medical waste within the geographical areas of their solid waste certificates and, therefore, are concerned with the allegation that Kleenwell Biohazard is transporting solid waste (specifically

1 medical waste) for collection and disposal for compensation over
2 the public highways of the State of Washington. It is anticipated
3 that this proceeding will involve substantial legal issues which
4 the proposed Intervenor is prepared to brief and discuss with the
5 Commission.

6
7 **BROADENING OF ISSUES:** The proposed intervention will not
8 broaden the issues in this matter.

9 Respectfully submitted,

10
11 
12 _____
13 JAMES K. SELLS
14 WSBA No. 6040
15 Attorney for Intervenor Washington
16 Waste Management Association

17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on this day a true copy of the foregoing
19 was mailed by first class mail, postage prepaid, to the following:

20 Enoch Rowland, d/b/a Kleenwell
21 Biohazard & General Ecology Consultants
22 Suite A
23 17800 Des Moines Way South
24 Seattle, WA 98148

25 James T. Johnson
26 Attorney at Law
27 Two Union Square
28 Suite 3000
29 601 Union Street
30 Seattle, WA 98101-2324

31 _____
32 JAMES K. SELLS

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Subscribed and sworn to before me this 21st day of April,
1992

Michael Haberly
Notary Public for the
State of Washington
Residing at Bremerton
My commission expires 11/01/96