



Recovery 1, Inc.

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March 16, 2009

Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Reference: Docket TG-080591

Responding to March 11, 2009 – Staff's Draft Proposal for Discussion Purposes

- 4) Uses that are not "for disposal".
f) Use for daily cover or alternative daily cover.

Recovery 1, Inc. is a Construction, Demolition & Land-clearing, (CDL) debris recycling facility located in the Port of Tacoma. The comments I will be offering regarding the UTC changes are based upon 14-years of experience dealing with recycling transporters and certificated waste haulers.

- 1.) Recovery 1 is a processing company.
- 2.) Recovery 1 does not offer job-site collection services.
- 3.) 100% of the materials we receive for processing are considered solid waste "as received". As such; we have a solid waste handling permit with primary oversight provided by the Tacoma-Pierce County Health Department, (Permit No. 27-704).
- 4.) We manufacture many different commodities from the waste we receive including:
 - a. Wood Derived Fuel
 - b. Alternate Daily Cover
 - c. Pulp Furnish
 - d. Designer Mulch
 - e. Soil
 - f. Oil Absorbent
 - g. Gypsum for use in Portland Cement
- 5.) We segregate many materials for further processing by others including:
 - a. Steel
 - b. Copper Wire
 - c. Copper Pipe
 - d. Aluminum
 - e. Stainless Steel
 - f. Plastic Film
 - g. Rigid Plastic
 - h. Vinyl Siding
 - i. Concrete, Rocks, Bricks Porcelain
 - j. O.C.C. – (Old Corrugated Cardboard)
 - k. Carpet
 - l. Carpet Pad
 - m. Ceiling Tile
- 6.) We collect and ship some items for reuse/resale

A Permitted Facility, Specializing in Construction, Demolition & Land-Clearing Debris Recycling

Recovery 1, Inc. maintains a 30-cubic yard trash container on site which is serviced by the City of Tacoma Solid Waste Utility 1-2 times per month. Putresible trash that is thrown into the recycling roll-offs is transferred to this container and disposed of as garbage along with all of the shop and office waste generated by our company. This tonnage is recorded in our monthly Waste Stream Analysis reports as non-recyclable residuals.

Should ADC be classified as "Recycling/Reuse"? **YES**

ADC is allowed as an acceptable "Recycling/Reuse" material by the United States Green Building Council, (USGBC) however; in order for ADC to be calculated toward our LEED recycling rate, we are required to have a letter on site from the facility receiving the ADC stating that not only is the ADC we ship acceptable for that use, it is in fact utilized as ADC and not just discarded at the land-fill. The letter we have from Land Recovery Inc. (owner of the land fill located in Pierce County) states that 100% of the material we ship is acceptable for use as ADC however; due to site restrictions and needs, up to 10% may not be used as ADC. The distinction in acceptable use vs. actual use results in an automatic 10% shift of ADC from reuse to disposal when calculating our published LEED recycling rate.

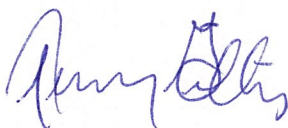
Given that both solid waste and ADC materials are transported to landfills, how could commission inspectors determine whether shipments will be used as ADC or for disposal?

The same way the USGBC resolves this issue as outlined above.

ADC is a product that makes sense as long as land-fills are a part of state's waste management system. Ultimately, this will change and ADC will not be a viable product because land-fills will be deemed unacceptable. Until that time, ADC should be used to replace clean soil as land-fill cover.

Thank you for the opportunity to state our position.

Sincerely,

A handwritten signature in blue ink, appearing to read "Terry Gillis".

Terry Gillis
General Manager
Recovery 1, Inc.