

COMMENT FORM FOR: Dennis Burke - ID# 19897

Consumer Information		Contact Method <input type="radio"/> Email <input checked="" type="radio"/> Mail <input type="radio"/> None
Name	Dennis Burke	
Organization Company		
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Comment Information		
Theme		Open Date 03/31/2009
Filing Support	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Undecided	Closed Date
Source	<input type="radio"/> Email <input type="radio"/> Mail <input type="radio"/> Phone <input checked="" type="radio"/> Web	Web Create Date 03/26/2009
Public Involvement Lead		
Duplicate Comment	<input type="radio"/> Yes <input type="radio"/> No	

Description I am concerned about the proposed rule since it appears to further the monopoly by the few horizontally and vertically integrated waste management firms. It is unlikely that any other firm can or will obtain a solid waste collection certificate or a solid waste certificate from the UTC under the current rules. Those wishing to recycle organic waste (aka "solid waste", for the purpose of generating renewable energy and reducing greenhouse gas emissions can only qualify as "commercial recycling" under the proposed rule. However, that recycling capability is severely restricted and may in fact be nonexistent thus eliminating biomass renewable energy generation in Washington.

Under 3) b) of the proposed rule it states the following: "motor carriers may not collect and transport recyclable materials that contain solid waste". Is one to interpret this statement as a restriction on the recycle of biomass or waste biomass for the production of energy? RCW 81.7 7.0 10 defines "solid waste" as having the same definition as under RCW 70.95.030 "except for the purpose of this chapter solid waste does not include recyclable materials except for source separated recyclable materials collected from residences". RCW 70 .95 .0 30 defines solid waste as meaning all putrescible and nonputrescible solid and semi solid wastes including bit not limited to garbage, etc. etc." So substituting those definitions into the new rule results in the following:

"motor carriers may not collect and transport recyclable materials that contain putrescible and nonputrescible solid and semi solid wastes including bit not limited to garbage, etc. etc except for the purpose of this chapter solid waste does not include recyclable materials except for source separated recyclable materials collected from residences"

Since I am not a Philadelphia lawyer I have difficulty in interpreting the restriction placed in the proposed rule 3 (b). Please clarify.

I think it is important that the commission realize that placing restrictions on the recycle of organic substrates for the purpose of generating renewable energy and or abating greenhouse gas emissions is counter to the goals of the state of Washington, the United States and the World. The remaining few monopolistic waste management firms may choose other paths of recycling waste such as greenhouse gas emitting compost facilities. Consequently it is important that private enterprise that is not part of the current waste management cartel be allowed to collect and recycle organic materials from commercial and industrial establishments.

In a related matter I do not believe that recycling of organic waste for ADC prior to stabilization e.g. composting, anaerobic digestion etc. should be considered recycling and reuse. Unlike composted or anaerobic digestion products it is still classified as a "solid waste" material. It will continue to degrade resulting in vector attraction and distribution of bacteria and viruses. It will also generate significant air pollution and greenhouse gas emissions while it is undergoing stabilization on the open ground.

Attachments

Issue Information

Issue ID	
Company	Environmental Energy & Engineering Co.
Filing	
Staff	

Complaint Information

Unresolved Complaint	<input type="radio"/> Yes <input type="radio"/> No	Complaint ID	
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Follow-Up Information

Follow-Up	<input type="radio"/> Yes <input type="radio"/> No
Follow-Up Staff	
Follow-Up Complete	<input type="radio"/> Yes <input type="radio"/> No

Other Follow-Up Information

Other Follow-Up	<input type="radio"/> Yes <input type="radio"/> No
Other Follow-Up Staff	

Activites For Dennis Burke

Date