

March 26, 2009

Mr. Tim Fife, PE
Public Works Director/County Engineer
Franklin County Public Works
3416 Stearman Ave.
Pasco, WA 99301-7104

Dear Mr. Fife:

The Utilities and Transportation Commission (commission) has completed its review of the preliminary draft of the Franklin County Comprehensive Solid Waste Management Plan Update for the years of 2008-2013 (Plan) in Docket TG-090253.

Staff's analysis of the Cost Assessment portion of the Plan shows no impact to customers served by regulated solid waste collection companies in Franklin County. According to the Cost Assessment portion of the Plan, disposal fees will not increase from the current rate of \$50.00 per ton.

Staff provides the following comments for consideration:

1. The Plan describes solid waste collection companies as "franchise collectors." The commission issues Certificates of Public Convenience and Necessity. Please change all references from "franchise" to "certificate" or "certificated" as it relates to regulated solid waste collection companies. Currently, the plan uses both "franchise" and "certificate or certificated."
2. Section 4.4.2 Recyclables: Staff is concerned that the County has not designated recycling materials in the current version of the Plan. Page 16 of the "*Guidelines for the Development of Local Solid Waste Management Plans and Plan Revisions*," states: "*Another aspect of recycling that must be in the plan is designation of what recyclable materials will be collected (RCW 70.95.010(7)(c).*" The Department of Ecology establishes the guidelines for counties to use while developing their plans. Discussion of the "market conditions" does not "designate" what is recyclable within the County.
3. Chapter 6.0 Collection Systems, the last paragraph on page 1 should be rewritten to reflect that a commercial recycler needs to obtain a motor carrier permit pursuant to RCW 81.80, not a solid waste certificate under RCW 81.77. RCW 81.77.010 states:

(8) Solid waste collection does not include collecting or transporting recyclable materials from a drop-box or recycling buy-back center, nor collecting or transporting recyclable materials by or on behalf of a commercial or industrial generator of recyclable materials to a recycler for use or reclamation. Transportation of these materials is regulated under RCW 81.80.

4. Chapter 9.8 Electronic Wastes: Please add that a company collecting commercial recycling products for compensation requires a motor carrier permit issued by the commission under RCW 81.80.

Please direct any questions or comments about the commission's review process to Ms. Penny Ingram at (360) 664-1242 or by email at pingram@utc.wa.gov.

Sincerely,

DAVID W. DANNER
Executive Director and Secretary

cc: James V. Wavada II, Environmental Planner, Department of Ecology, Eastern Regional Office
Laurie Davies, Solid Waste and Financial Assistance Program Manager