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April 10, 2009

David W. Danner
Executive Secretary and Secretary
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250

Re: Solid Waste Rulemaking (Docket TG-080591)

Dear Mr. Danner

Sanitary Service Company, Inc. (SSC) appreciates the opportunity to comment to the Washington Utilities and Transportation Commission (WUTC) on the "Staff's Draft Proposal for Discussion Purposes" offering revisions to the regulations governing solid waste collection.

At the outset, we thank Staff for their laudable efforts in trying to assist the industry in having a clearer understanding of when transporting commercial recyclables is legitimately performed without a certificate for solid waste collection, and when it is "sham" collection of solid waste. We offer the following observations on the draft revisions to the regulation governing Determination of authority to transport specific commodities or provide specific services, organized according to the proposed language and not necessarily presented in the order of importance.

Section 1: Clarification of when a certificate is needed for solid waste collection.

1) **Solid waste collection requires certificate**
Any person engaged in the collection and transportation of solid waste must hold a solid waste collection certificate issued by the commission (Chapter 81.77.040 RCW).

a) Engaged in the collection and transportation of solid waste means:

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i) Collecting solid waste from residential, commercial, or industrial customers and transporting it, using a motor vehicle, for disposal, over the highways of the state of Washington, for compensation.
ii) Collecting source-separated recyclables from residences and transporting it, using a motor vehicle over the highways of the state of Washington, for compensation (Chapter 81.77.010 RCW).

Comment re 1(a):

SSC supports these provisions, which restate the minimum of what the law requires. As a minor point, however, it is somewhat confusing to have the separate statements: the way we read the statutory definitions, the materials collected that are addressed in subsection (ii) are also addressed in subsection (i) because residential recyclables are within the meaning of the term "solid waste." Perhaps it would be easier to understand if one section talks about collection from residences, saying that it includes source-separated recyclable materials; and a second section addresses collection from commercial and industrial customers, saying it does not include source-separated recyclable materials.

Consider adding the following:

iii) Collecting construction and demolition debris from residential, commercial, or industrial building or remodeling job sites and transporting it, using a motor vehicle, for disposal, over the highways of the state of Washington, for compensation.

There seems to be some uncertainty about collection services from construction sites. The statutory definition of "solid waste" clearly includes construction and demolition debris ("C&D"), and yet apparently some of the commercial recyclers seem to believe that just because it's "rubbish" or "refuse" or "trash" and not "garbage," hauling for these customers is not regulated. It might help resolve the dispute by affirmatively stating that this is not the case.

Section 2: Clarification of when a certificate is not needed for solid waste collection.

2) **Private carriage of solid waste collection or solid waste collection under a local government contract does not require a solid waste collection certificate.**
The following do not need a solid waste collection certificate:

a) A business, such as a landscaping, cleanup, site restoration, or wood chipping business, that, in its own vehicles, transports solid waste as an incidental part of its established business, owned or operated in good faith (RCW 81.77.010 Private Carriers).
b) Companies providing solid waste collection services under contract with a city or town (RCW 81.77.020).
c) Companies collecting source-separated recyclable materials from residences under contract with a county (RCW 36.58.041 (1-2)).

Comment:

SSC has no comments on this section.

Section 3: Clarification of what authority is needed for commercial recycling collection.

3) **Commercial recycling collection requires a motor carrier permit**
Any person engaged in the collection and transportation of commercial or industrial recyclable materials for compensation over the highways of the state of Washington must hold a motor carrier permit issued by the commission pursuant to Chapter 81.80 RCW.

a) Motor carriers may collect and transport recyclable materials from a drop box, recycling buy-back center, or for commercial or industrial generators.
b) Motor carriers may not collect and transport recyclable materials that contain solid waste.
c) Transportation of recyclable materials must be for recycling, reprocessing, reclamation or for a process that extracts or modifies the commodity for reuse.
d) Transportation of recyclable materials must not be to a transfer station, landfill, or other disposal facility for disposal.
e) Transporters of commercial and industrial recyclable materials must also register with the Department of Ecology as a "transporter."

Comment re 3(a):

Collection of recyclable materials from a drop box that is located at a residence may not be peformed without a G-certificate. The statutory reference was intended to cover public drop boxes offered for consolidating recyclable materials. The rule should state that clarification.

Comment re 3(b):

SSC affirmatively supports this statement. These rules should stipulate procedures to be followed if a motor carrier finds non-recyclable solid waste in a recycling

box. Either the customer or the carrier should be required to contact the local authorized hauler.

Comment re 3(e):

SSC provided comments to the Department of Ecology on the proposed draft of its regulations for transporters of commercial recyclables. A copy of the comments are attached, and incorporated herein.

Section 4: Describing uses for which collection of solid waste would not be regulated.

4) **Uses that are not "for disposal."**
The following uses of commercial or industrial byproducts are not "for disposal" within the meaning of subsection 3(d) and do not require a solid waste collection certificate of convenience and necessity from the commission:

a) Any use that is identified for a recyclable material listed in a county's local comprehensive solid waste plan and related implementation ordinances (Chapter 81.77.030 RCW).
b) Animal feed or animal feed additives.
c) Producing energy from boiler fuel (hog fuel) or burning source-separated wood.
d) Producing combustible gas for energy using a biodigester.
e) Land application to enrich soil, or for composting to allow organic materials to decay to amend soil that is beneficial to plants.
f) Use for daily landfill cover or alternative daily cover.

NOTE: The commission seeks comment on whether use of waste material as alternative daily cover (ADC) or landfill daily cover should be classified as "recycling/reuse." Please provide your reasoning.

Comment re ADC:

SSC understands that "earthen materials" are the regulatory standard for daily cover, and does not object to the transportation of soils or sediments by motor carriers.

Nor does SSC object to motor carrier transportation to the landfill of alternative daily cover, if it is in the form that is ready to be used for cover material. If the ADC has been approved by the local health department, and it is delivered to the landfill in volumes that comply with that approval, hauling ADC to the landfill does not involve "solid waste collection."

The haul from the solid waste customer is a different story. Collection of materials that cannot be used directly for ADC should be regulated. In particular, SSC does

not think that a mixed load of C&D can be ground up and used for alternative daily cover. It is solid waste, and in and of itself, mixed C&D would not be approved by any local health department for use as ADC. Unless the C&D is very carefully sorted, there is no direct link between a box of mixed C&D and ADC, and it is fraudulent to tell contractors that any and all mixed loads can be recycled into ADC. There are certain materials in the C&D box that mgiht be suitable for ADC, but substances like gypsum and other contaminants are potentially hazardous. Therefore, a mixed load is more likely than not garbage, and SSC objects to collection of C&D from construction projects as a "recyclable material" under the justification that it will be used as ADC.

Section 5: Describing uses for which collection of solid waste would be regualted.

5) **Uses that are "for disposal."**
The following uses of commercial and industrial byproducts are "for disposal" and therefore the transportation of materials for these purposes requires a solid waste collection certificate from the commission:

a) Placement in a landfill, even if the landfill operator captures methane gas from the landfill for energy or uses the solid waste to meet structural or drainage requirements.
b) Incineration at a disposal facility that does not produce energy.
c) Use for daily landfill cover or alternative daily cover.

NOTE: As indicated above, the commission seeks comment on whether ADC should be listed here as a type of "disposal," or above as "recycling/reuse." Please provide your reasoning.

Comment re subsection 5(b):

If the incinerator is a "disposal facility," then it should not matter whether energy is produced. Either way, the use is "disposal."

See comments above re ADC.

Section 6: Setting out requirements for commercial recycling without certificate authority.

6) **Transporting recyclable materials to a sorting facility**
Unless the following conditions are met, a motor carrier transporting mixed recyclable materials to a sorting facility must have a solid waste certificate issued by the commission:

a) Any residual left over after sorting out material for non-disposal purposes must be transported from the sorting facility to a disposal site by a

certificated solid waste collection company or by a municipality that provides solid waste collection service itself or by contract.

b) The motor carrier holds itself out as a transporter of recyclable or reusable materials and not as a solid waste collection service.

c) The motor carrier requires its customer (shipper) to keep the recyclable or reusable materials separate from commercial or industrial byproducts that are to be disposed. Additionally, if the shipper does not use a certificated solid waste company or a municipality, the motor carrier must demonstrate to the commission that the shipper transports its own solid waste for disposal.

Comment re 6(a):

We suggest requiring the residual in each load be weighed and volume noted, and billed to the carrier for disposal by a permitted solid waste hauler. Cases where residual weight or volume is >10% would be referred to the WUTC for investigation and possible enforcement action.

Comment re 6(b):

SSC supports the rule expressly prohibiting commercial recyclers from "holding themselves out" as solid waste collection companies. Please see the copies of yellow pages included with this comment letter. To an uninformed consumer, these appear to be ads for solid waste collection services. No wonder so much confusion exists.

The WUTC could require an additional step to confirm that commercial recyclers are complying with this performance standard by requiring an annual report with copies of advertisements.

In addition, consider adding other annual reporting requirements for motor carriers collecting commercial recyclables. For instance, commercial recyclers should label boxes used for source-separating, informing customers what can be put in the recycling box. Recyclers could easily submit copies of the labels they have used. The rule requires the carrier to ensure that customers have a separte container for non-recyclable materials, and documentation of compliance with that could also be submitted. Recyclers could include a copy of the annual report they file with the Department of Ecology, showing the facilities to which materials are delivered and quantities collected and delivered. The WUTC has some authority over motor carriers, and asking for evidence of compliance with performance standards is reasonable.

Comment re 6(c):

The requirement for a minimum of two containers, one for source-separated recyclable materials and another for remaining solid waste, is absolutely

mandatory. Otherwise, the shipper cannot have intended recycling. Commercial recyclers should be required to adhere labels to the recycling boxes stating what material is accepable, as a further measure to ensure the materials are in fact actually recyclable. Such a practice would enhance the value of the commodities, and is not inconsistent with the interests of the transporters.

The box for the non-recyclable solid waste must be sized in an appropriate proportion to the size of the facility. For example, if the commercial recycler is claiming that only 10% of the material being collected is non-recyclable solid waste, then a container suitable for 10% of the volume of solid waste being generated would be the minimum.

Furthermore, proportional service frequency to achieve proportional results is critical. A proportionately appropriate box that is hauled only once in six months while "recycle" boxes are hauled weekly is no solution at all. Commercial recyclers should be required to document that appropriate solid waste collection services are being provided at the site.

If the certificated hauler becomes aware of a job in its territory that lacks appropriate solid waste collection, and notifies the WUTC of that situation, enforcement staff follow-up is critical. There should be a process triggering site-inspection that is short of a formal complaint. If there quicker, but more random inspections, then the industry would know that someone is looking. This awareness in and of itself could curtail negligent behavior and stimulate greater compliance. A few random inspections would suffice to get the word out.

In conclusion, SSC supports many of the concepts presented in the discussion draft rules. We look forward to further opportunities to clarify and comment.

Sincerely,

SUMMIT LAW GROUP PLLC

Polly L. McNeill

cc: Rodd Pemble
Paul Razore

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December 23, 2008

VIA E-MAIL - RAMA461@ECY.WA.GOV

Department of Ecology
Randy Martin
P.O. Box 47600
Olympia, WA 98504-7600

Re: Comments on Ecology's Proposed Chapter 173-345 WAC Recyclable Materials – Transporter And Facility Requirements

Dear Randy:

As you know, my practice involves representation of solid waste collection companies, and on behalf of several of my clients, these comments are submitted to the Department of Ecology on the above-referenced proposed regulations, *Chapter 173-345 WAC, Recyclable Materials – Transporter And Facility Requirements*. We support the intent of Engrossed Substitute Senate Bill 5788 (SB 5788), enacted by the Legislature in 2005 and primarily codified at RCW 70.95.400 through -440, to eliminate illegal disposal of recyclable materials and protect consumers from sham recycling.

While we appreciate the efforts made by Ecology in proposing these rules, we believe there is much work to do and many details to address before a final regulation can be adopted. In addition to the substantive comments provided in this letter, on the procedural level we recommend Ecology consider the input provided and issue another draft with more detail and more guidance than these rules offer. The current proposal does little more than restate statutory language.

As a point of context, the whole reason this regulation is needed is because of the pre-existing statutory exemption which states:

> Nothing in this chapter shall be construed as prohibiting a commercial or industrial generator of commercial recyclable materials from selling, conveying, or arranging for transportation of such material to a recycler for reuse or reclamation.

See RCW 70.95.903; RCW 81.77.140; RCW 36.58.160; RCW 35.21.158. In enacting this exemption, the legislature created a gray area for transportation of commercial recyclables. It is to assist in understanding when a hauler is transporting commercial recyclable that SB 5788 was enacted. Although SB 5788 does not restate the existing statutory underpinning, it cannot and should not be ignored. We offer the following

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comments with the goal of more clearly specifying when commercial recycling is taking place, and when it is being used as a means of avoiding regulatory oversight and commensurate taxes and fees. We seek assistance in having a commonly understood "level playing field."

Collection Site

Unless the material in the truck is source-separated, the transporter is not carrying commercial recyclables. Therefore, a separate container on each customer site for non-recyclable material is compelling evidence that a generator intends recycling, and the absence of a container is a fatal flaw. Separating recyclable materials from other solid waste at the source is a mandatory prerequisite to the site-preparation of materials that can be hauled by any transporter under the statute, and there is no situation in which a generator can produce only recyclable materials, i.e., all customers generate some non-recyclable items or materials. It would seem to be in the best interest of all the stakeholders to mandate that separate containers be present. The rules should require the transporter to verify the presence of separate containers. Transporters ignoring this requirement will put themselves at risk of violating the law, and there is no good reason for opposing it.

Separate containers are at the heart of the enacting legislation. Without them, there can be no sorting evidenced. Indeed, a careful transporter should ensure not only that separate containers are present, but also that they are of the appropriate size. Requiring the transporter to check that the container for non-recyclable materials is large enough may be asking too much of this rule. Surely verifying only that separate systems exist is not an inappropriate burden.

Delivery Site

The draft regulation does little to "to ensure that recyclable materials diverted from the waste stream for recycling are routed to a facility in which recycling occurs." RCW 70.95.020(4). We understand this is a challenging and sensitive area and one on which current regulations are not particularly helpful. However, this rulemaking could assist transporters and regulators in clarifying what facilities might or might not meet this goal.

There are several different, but related, issues worth considering about the type of facility to which transporters may legally deliver recyclable materials. This rule approaches it only from one perspective, and it identifies in exceedingly broad terms the locations to which recyclable materials may not be delivered. For this rule to be enforceable, more detail is required describing those prohibited destinations. On the other hand, the regulation ignores the other perspective and fails completely to describe the facilities to which delivery of recyclable materials would be permissible.

Part of this conundrum may be attributed to the definitions in the existing Solid Waste Handling Standards, chapter 173-350 WAC (the Standards), where the lines between "material recovery facility" and "transfer station" are not clearly drawn. Under the

Standards, both MRFs and transfer stations are regulated as "interim solid waste handling facilities," and the only meaningful distinction is for those MRFs meeting the exemption requirements. Because the Standards are directed to protecting human health and the environment, it is not necessary to have a bright line demarcation and therefore adopting those definitions may not be appropriate to this rule. Ecology should consider articulating different definitions or at least describing more clear operational distinctions in this rule.

Another part of the problem is that the definition of "processing" includes both converting a material into a useful product (i.e., recycling) and preparation *for disposal* (i.e., not recycling). Adoption of that definition in these rules only obscures the distinctions, and is not particularly helpful.

A narrow definition of "recycling" is the scheme established under the Standards, but it is not commonly understood. Many people think "recycling" is what happens at a MRF, and there are well-intentioned operators all over the state believing themselves to be exempt from permitting because they are "recycling" when really they are operating a MRF. This is an opportunity to emphasize that the definition of "recycling" applies to plants and remanufacturers; and many of the operations claiming to recycle actually are MRF facilities that collect, compact, repackage, sort, or process. The former is definitely an acceptable destination for commercial recyclables; the latter is not always.

These facilities can rarely, if ever, qualify for a "clean MRF" exemption in accordance with WAC 173-350-310(2)(b), yet they commonly operate under the regulatory radar of the Standards, which are oriented to environmental risks, not social policy. Permitting Standards are not the right indicia for facilities under this rule – performance standards are far more effective at providing incentives for recycling, and tools for enforcement. This rule is instead intended to assist in eliminating sham recycling. Some permitted MRFs are quite legitimately focused on processing for recycling, not disposal, and are valid delivery destinations. Some permitted transfer stations have rudimentary sorting, and if that's the best local alternative then delivery to such a facility might be legal, but if it's just being used to justify sham recycling, it is not.

There are ways to identify a legitimate processing facility and stating them in this rule would be enormously helpful to all stakeholders.

Thus, at one end of the spectrum, the rule should state the obvious, and expressly allow transporter to deliver recyclable materials to a facility that actually recycles. It should specifically permit delivery to "a facility that transforms or remanufactures recyclable materials into usable or marketable products," which is a slight variation to the definitions in the Solid Waste Handling Standards.

The rule could also state, for instance, that a MRF that accepts only source separated recyclable materials and disposes of an incidental and accidental residual of less than five percent of the total waste received, by weight per year, or ten percent by weight per load (i.e., an "exempt" MRF) is a legal destination. In short, the rule could state that facilities

that have filed notifications in accordance with WAC 173-345-080 are legitimate destinations. Requiring notification and reporting from those facilities under this rule protects against the permit exemption being used as a loophole.

In the middle, the rule should give some guidance for transporters to distinguish between a transfer station that happens to prepare some material for reuse and recycling but "processes" most material for disposal; and a MRF that prepares most of its material for the purpose of recycling. Both might be excused from notification under -080 by virtue of being "facilities with a current solid waste handling permit." Yet, some are nonetheless valid destinations, and some are not.

Guidance might be found by reference to local solid waste management plans. If the local planners have identified facilities which are predominantly devoted to preparing material for the purpose of recycling, then deference may be given to that determination. The rule could state that as a possible means of determining what facilities are acceptable is whether they are identified as recycling processors in the local plan.

Ecology could consider listing in the rule other indicia of legitimate destinations, none of which would be determinative in and of themselves but any of which might be helpful in distinguishing between valid and invalid destinations. A facility that is predominantly devoted to processing source-separated recyclable materials by reference to the complexity of machines, equipment or infrastructure would be preferred over an interim handling facility that secondarily processes recyclable materials in a rudimentary fashion, depending on the reasonably available alternatives. Another factor could be the degree to which more materials taken from the facility are solid waste residuals transported for disposal or MSW incineration regardless of market conditions or more are prepared as commodities for reuse or recycling to the maximum extent markets justify.

We urge Ecology to solicit input on a second draft with more specific descriptions and indicators to assist commercial recyclers in making sure they are legitimately transporting unregulated materials.

Exceptions

The exceptions under WAC 173-345-050(2) are somewhat murky. We acknowledge they are straight from the legislative language, but some descriptions might help understanding the intent. For instance, the classic example of a carrier hauling its own material exempt under subsection 050(2)(a) when such activity is "incidental" to its primary business is a landscaper who hauls compostable materials from job sites. The landscaper's primary business is not hauling recyclable materials and it would not be considered a "transporter." (Also, we do not believe the proposed definition of "incidental" actually captures that activity, since the landscaper's haul is not by chance or unintentional.)

The difference between the incidental hauler and the exemption in subsection -050(2)(e) could also be clearer by providing illustrations or embellishments. The landscaper is not

a common carrier, clearly. This exemption is instead typified by a dump truck operator who hauls a load of glass cullet once in a while.

Finally, we are somewhat troubled by subsection -050(2)(b), and the potential for misinterpreting the exemption for entities who have "purchased" recyclables. First, to the extent the distinction turns on the exchange of money, it must be made clear that the cost of transportation must be factored into whether or not the material was purchased. The legislative intent, we believe, was to address straightforward situations where recyclers are being compensated solely by virtue of the value of the commodity. In current market conditions, of course, this is not happening. There have been times, however, when the value of the commodity was sufficient to cover the transportation and overhead costs. That is the narrow situation contemplated here. Any inference about taking title is dangerously misleading. Many garbage collectors take title when they pick up waste. They cannot then claim they "own" the materials and therefore transport outside the solid waste regulations and avoid paying taxes.

On behalf of my client, we thank you for allowing us to submit these comments. We urge you to take advantage of this opportunity for clarification. Solid waste collection companies embrace the requirements of compliance with this law, and appreciate Ecology's efforts to bring consistency to the realm of commercial recycling.

Very truly yours,

SUMMIT LAW GROUP PLLC

Polly L. McNeill (by KAH)

Polly L. McNeill

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