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7 BEFORE THE WASHINGTON STATE
8 UTILITIES AND TRANSPORTATION COMMISSION

9 Application of Waste Management of
10 Washington for Temporary Biomedical
11 Waste Authority

Docket TG-120034

12
13 PROTEST OF WASHINGTON
14 REFUSE AND RECYCLING
15 ASSOCIATION

16
17 **COMES NOW** Washington Refuse and Recycling Association (WRRRA)
18 and protests the above-referenced Application and in doing so alleges and
19 prays as follows:

20 1) This protest is filed on behalf of WRRRA pursuant to WAC 480-70-
21 131(8); and on behalf of specific member companies currently providing
22 biomedical waste services within the State of Washington:

23 Rubatino Refuse Removal, Inc. (G-58)
24 Consolidated Disposal Services, Inc. (G-190)
25 Murrey's Disposal, Inc. (G-9)
26 Pullman Disposal, Inc. (G-42)

2) This application does not meet the requirements of WAC 480-70-
131(2) in that it fails to demonstrate an "immediate or urgent need for the
requested service." Further service is ". . . currently available from an existing
company serving the territory." In view of the fact that there are areas within
the state served by two companies by reason of Stericycle's statewide permit
(G-244), all of the State of Washington is served by at least one, and in some
cases two, companies.

Protest of Washington Refuse and
Recycling Association - 1

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JAMES K. SELLS

Attorney at Law

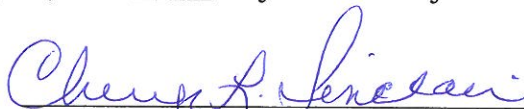
PMB 22, 3110 Judson St., Gig Harbor, WA 98335
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding, by the method as indicated below, pursuant to WAC 480-07-150.

Polly L. McNeill Summit Law Group 315 - 5th Avenue S. Seattle, Washington 98104 <u>pollym@summitlaw.com</u>	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
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David W. Danner Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW PO Box 47250 Olympia, WA 98504-7250 360.664.1160 <u>records@utc.wa.gov</u>	<input type="checkbox"/> Via Legal Messenger <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via Email
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DATED at Silverdale, Washington, this 12th day of January 2012.


 Cheryl L. Sinclair